EPA Reg. No. 62719-632

ISB'S Front-end PRIA Completeness Screen

Draft 3; 10/25/07

EPA Receipt Date: 9/7/2010	EPA Reg. Number: 62719-AGE

	Check List Item	Yes	No	N/A
1	Has the **PRIA Fee been Paid**; is a copy of the check or Pay.gov receipt included in the Submission Package?	X		
2	Is an **Application Form** (EPA Form 8570-1) Included in the Submission Package, is it completely filled out and signed including package type?	X		
3	Is a **Confidential Statement of Formula** (EPA Form 8570-29) Included in the Submission Package, is it completely filled out and signed (boxes 1-21)?	X		
4	Is a **Formulator's Exemption Statement** (EPA Form 8570-27) Included in the Submission Package?		X	
5	Is a **Certification with Respect to Citation of Data** (EPA Form 8570-34) Included in the Submission Package?	X		
6	Is a **Data Matrix** (EPA Form 8570-35) Included in the Submission Package?	X		
7	Is a **Label** Included in the Submission Package?	X		
8	Are **Data** Included in the Submission Package?	X		
9	**Is the Submission an Amendment?**			

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Diego Fonseca
Regulatory Leader
Dow AgroSciences, LLC
9330 Zionsville Road
Indianapolis, IN 46268

SEP 2 6 2011

Dear Mr. Fonseca:

Subject: GF-2668 Manufacturing Use Concentrate
Review of Alternate #1 Confidential Statement of Formula (CSF)
EPA Reg. No. 62719-632
Your Submission Dated: June 24, 2011

The amendment referred to above, submitted in connection with registration under The Federal Insecticide Fungicide and Rodenticide Act (FIFRA), as amended is acceptable.

Alternate #1 CSF (dated 06-23-11) is acceptable and has been added to your record as current and updated and must supersede all other basics CSFs on file.

Sincerely,

Kathryn V. Montague
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060 Print Form

United States
Environmental Protection Agency
Washington, DC 20460

[ ] Registration
[X] Amendment
[ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number
Dow AgroSciences/62719-632

2. EPA Product Manager
Kathryn Montague

3. Proposed Classification
[X] None [ ] Restricted

4. Company/Product (Name)
Dow AgroSciences/GF-2668 Manufacturing Use Concentrate

PM#
23

5. Name and Address of Applicant *(Include ZIP Code)*
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268
[ ] *Check if this is a new address*

6. **Expedited Review.** In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:
EPA Reg. No. _____
Product Name _____

Section - II

[X] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in response to Agency letter dated _____
[ ] "Me Too" Application.
[ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Proposed new Alternate #1 Confidential Statement of Formula (CSF) for GF-2668 Manufacturing Use Concentrate Herbicide dated June 23, 2011.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging
[ ] Yes*
[ ] No
* *Certification must be submitted*

Unit Packaging
[ ] Yes
[ ] No
If "Yes" Unit Packaging wgt. / No. per container

Water Soluble Packaging
[ ] Yes
[ ] No
If "Yes" Package wgt / No. per container

2. Type of Container
[ ] Metal
[ ] Plastic
[ ] Glass
[ ] Paper
[ ] Other (Specify) _____

3. Location of Net Contents Information
[ ] Label [ ] Container

4. Size(s) Retail Container

5. Location of Label Directions
[ ] On Label
[ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product
[ ] Lithograph
[ ] Paper glued
[ ] Stenciled
[ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Diego Fonseca	Regulatory Leader	317-337-4693

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature [signature]

3. Title
Regulatory Leader

4. Typed Name
Diego Fonseca (dfonseca@dow.com)

5. Date
June 24, 2011

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

E-SUBMISSION

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

308/2E
June 24, 2011

Dow AgroSciences

Document Processing Desk **(E-SUB)**
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P) (7505P)

GF-2668 MANUFACTURING USE CONCENTRATE (AI: 2,4-D)
EPA REGISTRATION NUMBER: 62719-632
AMENDMENT OF SECTION 3 REGISTRATION - CONFIDENTIAL STATEMENT OF FORMULA

Enclosed is a proposed new Alternate #1 Confidential Statement of Formula (CSF) for GF-2668 Manufacturing Use Concentrate Herbicide.

Dow AgroSciences is submitting this submission electronically (e-PRISM.xml CSF amendment for **GF-2668 Manufacturing Use Concentrate**).

- CD containing e-PRISM.xml – CSF Amendment Submission as follows:
  - Transmittal document (this letter)
  - Application for Pesticide, EPA Form 8570-1
  - Confidential Statement of Formula for GF-2668 Manufacturing Use Concentrate dated June 23, 2011 (2 Pages)

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827 (kahipsky@dow.com).

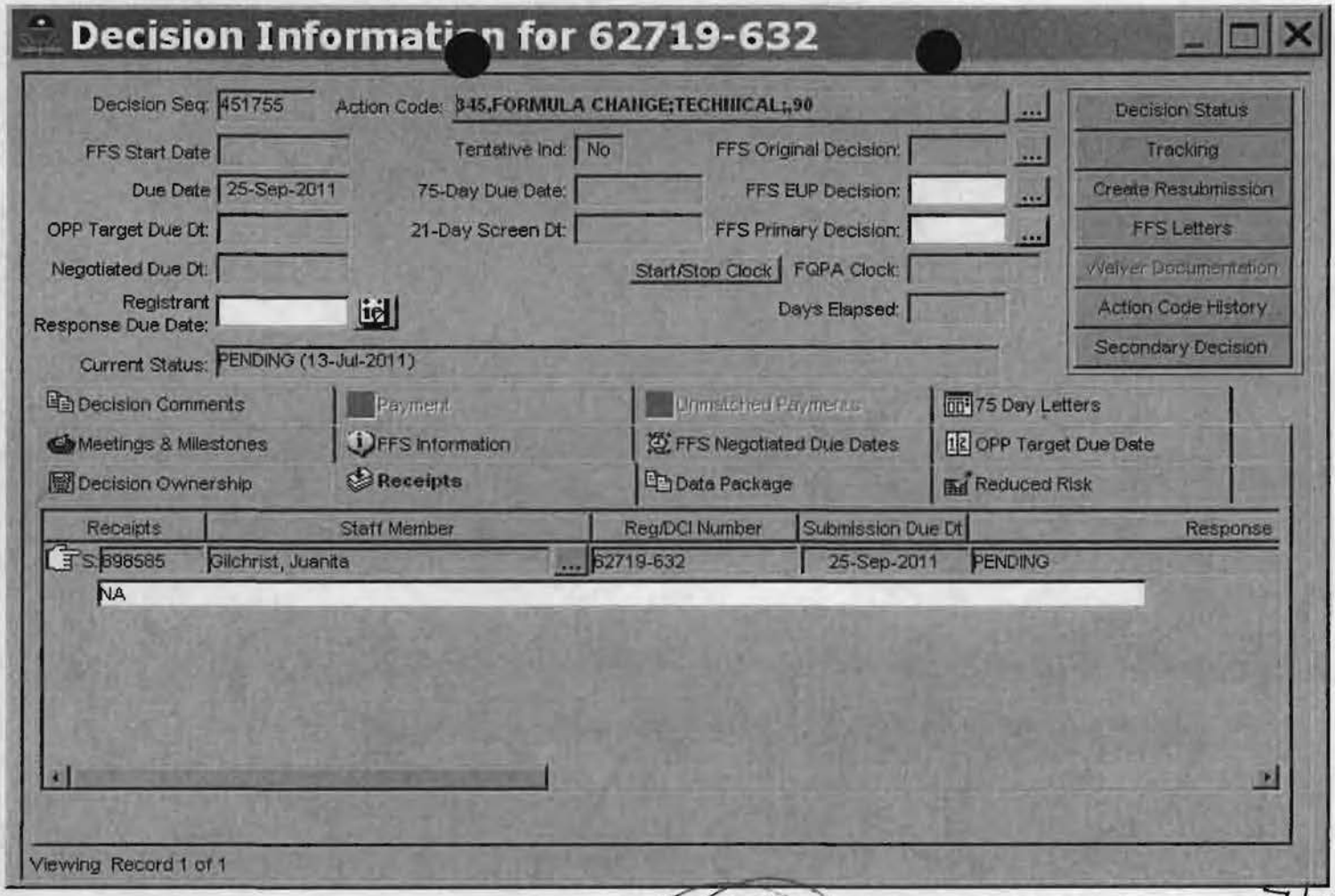
Sincerely,

Diego Fonseca
Regulatory Leader - Regulatory Affairs
317-337-4693
317-337-4649 (FAX)
dfonseca@dow.com

Enclosures

DF/kh

E-SUBMISSION



7/13/11

345 due 9/25/11

Thanks,

Juanita!

Kay

9-25-11

PM 33 (HB)

FAST-TRACK AMENDMENTS–Completeness Screening Checklist

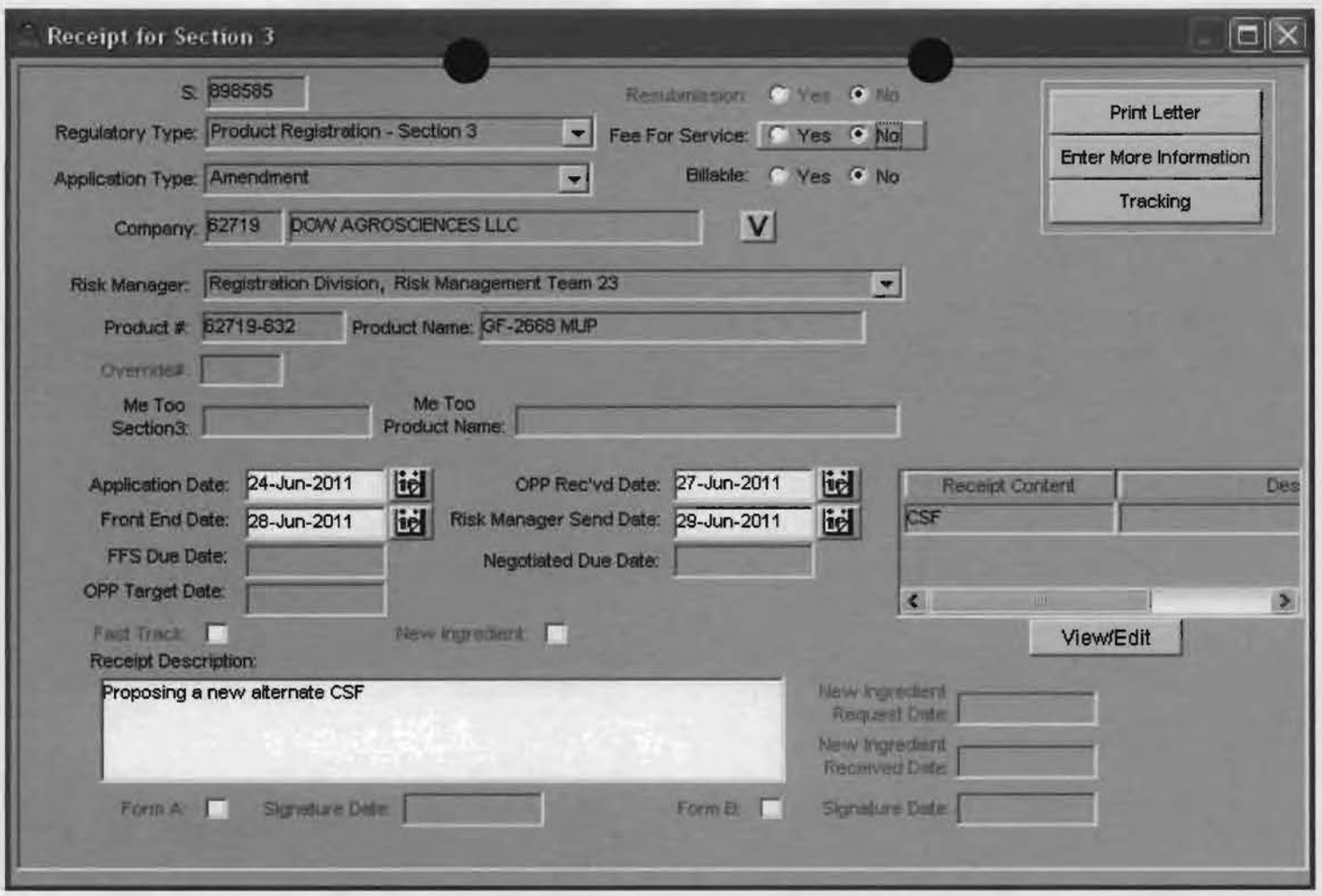
Experts In-Processing Signature: Schmidle 7/1/11

EPA Reg. Number: 62719-632	EPA Receipt Date: 6/27/11

	Check List Item	Yes	No	NA
1	**Application Form** (EPA Form 8570-1) –signed?	✓		
2	**Confidential Statement of Formula** (EPA Form 8570-29) – signed?	✓		
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) signed?			✓
4	**Formulator's Exemption Statement** (EPA Form 8570-27) - signed?			✓
5	**Data Matrix** (EPA Form 8570-35) [Applicable, for adding me-too uses]			✓
	a) Selective Method?			
	b) Cite-All Method? Applicant owns data or list only the companies offered to pay .			
	c) Public copy of Matrix provided? See PR Notice 98-5			
6	**Is Label Included? (5 copies)**			✓
	Comments:			

visits review needed

Insects approved


Receipt for Section 3
S: 898585
Resubmission: Yes No
Regulatory Type: Product Registration - Section 3
Fee For Service: Yes No
Application Type: Amendment
Billable: Yes No
Company: 62719 DOW AGROSCIENCES LLC
Print Letter
Enter More Information
Tracking
Risk Manager: Registration Division, Risk Management Team 23
Product #: 62719-632
Product Name: GF-2668 MUP
Override#:
Me Too Section3:
Me Too Product Name:
Application Date: 24-Jun-2011
OPP Rec'vd Date: 27-Jun-2011
Front End Date: 28-Jun-2011
Risk Manager Send Date: 29-Jun-2011
FFS Due Date:
Negotiated Due Date:
OPP Target Date:
Receipt Content
Des
CSF
Fast Track:
New Ingredient:
View/Edit
Receipt Description:
Proposing a new alternate CSF
New Ingredient Request Date:
New Ingredient Received Date:
Form A:
Signature Date:
Form B:
Signature Date:

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 29, 2011

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

JOHN R. FITT, JR.
DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 308/2E
INDIANAPOLIS, IN 46268-1054

PRODUCT NAME: GF-2668 MUP
COMPANY NAME: DOW AGROSCIENCES LLC
OPP IDENTIFICATION NUMBER:
EPA FILE SYMBOL: 62719-632
EPA RECEIPT DATE: 06/27/11

SUBJECT: RECEIPT OF AMENDMENT

DEAR REGISTRANT:

The Office of Pesticide Programs has received your application for an amendment and it has passed an administrative screen for completeness.

During the initial screen we determined that the application appears to qualify for fast track review. The package will now be forwarded to the Product Manager for review to determine its acceptability for fast track status.

If you have any questions, please contact Registration Division, Risk Management Team 23, at (703) 305-1243.

Sincerely,

P. K Moore
Front End Processing Staff
Information Services Branch
Information Technology & Resources Management Division

Fee for Service

{898585`~

This package includes the following

- ○ New Registration
- ◉ Amendment

□ Studies? □ Fee Waiver?

□ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 23

Receipt No. S-	898585
EPA File Symbol/Reg. No.	62719-632
Pin-Punch Date:	6/27/2011

☒ This item is NOT subject to FFS action.

Action Code:

Requested:

Granted:

Amount Due: $ _____

Inerts approved. S. Roar 7/7/11

Parent/Child Decisions:

☒ Inert Cleared for Intended Use ▣ Uncleared Inert in Product

Reviewer: [signature] Date: 6/29/11

Remarks:

IF THIS NEEDS A PRA FEE ASSESSED PLEASE RETURN TO STEVE S.

E-SUBMISSION

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

Dow AgroSciences

308/2E
April 4, 2011

Document Processing Desk (**FIN-LABEL**)
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: Kathryn V. Montague (7505P)

GF-2668 MUP (A.I. 2,4-D)
EPA REGISTRATION NUMBER: 62719-632
SUBMISSION OF FINAL PRINTED MAIN LABELING

Enclosed is final printed labeling for GF-2668 MUP herbicide based on EPA-accepted labeling dated March 24, 2011 with the following conditions of acceptance:

1. Added EPA Reg No. 62719-632. The EPA Establishment Number and net contents will be added at the time of production.
2. Did not add Spanish signal word and additional Spanish language text underneath. The Spanish signal word is required on products that meet the criteria for Worker Protection Standard. This is a manufacturing use product and does not meet that criteria. Therefore, it is not appropriate to add the Spanish signal word to this label.
3. Precautionary Statements: Revised statements.
4. First Aid: (1) Placed "If swallowed" as the second bullet point; (2) deleted "or clothing" from "If on skin.: (3) did not add a Note to Physician because this product does not meet any of the criteria required for this statement as detailed in Chapter 7 of the Label Review Manual.
5. Warranty Limitations and Disclaimer: Did not change "To the extent permitted by law." Per a January 25, 2007 conversation between Michele Knorr (EPA OGC) and Charley Kirk (DAS Legal), EPA has no objection with DAS using the phrase "To the extent permitted by law."

Contents of Submission

- Transmittal document (this letter)
- Label entitled GF-2668 MUP (K1A GF-2668 MUP/FPL/04-04-11) (4 Pages plus Registration Notes) (1 Copy)
- Complimentary copy of EPA stamped-accepted label dated March 24, 2011

If you require further information, please contact Cindy Loy, Regulatory Specialist at (317) 337-4655.

Sincerely,

Cindy Loy for

Diego Fonseca
Regulatory Leader
(317) 337-4693
(317) 337-4649 (FAX)

Enclosures

GF-2668 MUP

EPA Reg. No. 62719-632

Registration Notes:

Final printed label based on EPA-accepted text dated March 24, 2011 with the following conditions of acceptance:

1. Added EPA Reg No. 62719-632. The EPA Establishment Number and net contents will be added at the time of production.
2. Did not add Spanish signal word and additional Spanish language text underneath. The Spanish signal word is required on products that meet the criteria for Worker Protection Standard. This is a manufacturing use product and does not meet that criteria. Therefore, it is not appropriate to add the Spanish signal word to this label.
3. Precautionary Statements: Revised statements.
4. First Aid: (1) Placed "If swallowed" as the second bullet point; (2) deleted "or clothing" from "If on skin.; (3) did not add a Note to Physician because this product does not meet any of the criteria required for this statement as detailed in Chapter 7 of the Label Review Manual.
5. Warranty Limitations and Disclaimer: Did not change "To the extent permitted by law." Per a January 25, 2007 conversation between Michele Knorr (EPA OGC) and Charley Kirk (DAS Legal), EPA has no objection with DAS using the phrase "To the extent permitted by law."

(Label)

GF-2668 MUP

Herbicide

For Manufacturing Use Only

Active Ingredient:
2,4-dichlorophenoxyacetic acid,
choline salt..... 65.3%
Other Ingredients..... 34.7%
Total 100.0%

Acid Equivalent:
2,4-dichlorophenoxyacetic acid - 44.5% - 4.5 lb/gal

WARNING

Precautionary Statements

Hazards to Humans and Domestic Animals

Causes Substantial But Temporary Eye Injury • Harmful If Swallowed

Avoid contact with skin or clothing. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.
If on skin: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This product is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For Manufacturing Use Only
Only for formulation into an herbicide for the following uses: aquatic uses, banks of irrigation canals and ditches, barley, bayous, canals, corn (field, sweet, and popcorn), crop stubble, drainage ditches, established grass pastures, fallow land, forestry, lakes, marshes, millet, non-cropland areas, oats, ornamental turfgrass, pistachio orchard floors, pome fruit orchard floors, ponds, rangeland, reservoirs, rice, rivers and streams, rye, sod farms, sorghum-grain sorghum (milo) and forage, soybeans, stone fruit orchard floors, sugarcane, tree nut (excluding filberts) orchard floors, turfgrass grown for seed, and wheat.

Wettable powder formulations must be packaged in water-soluble packages.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

(Storage and Disposal for rigid containers 5 gal or less)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.
Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.
Container Handling: Nonrefillable container. Do not reuse or refill this container.
Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for refillable rigid containers larger than 5 gal)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.
Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.
Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.
Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal,

empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical, agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for nonrefillable rigid containers larger than 5 gal)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Handling: Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Warranty Limitations and Disclaimer

Dow AgroSciences warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

To the extent permitted by law, this is the only warranty made on this product. TO THE EXTENT PERMITTED BY LAW, Dow AgroSciences EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. To the extent permitted by law, buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-632 EPA Est. ___ ___

Produced for
Dow AgroSciences LLC
9330 Zionsville Road

Indianapolis, IN 46268

Net Contents _____

EPA accepted 03/24/11

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

EPA Reg.Number:	Date of Issuance:
62719-632	MAR 24 2011

Term of Issuance: Conditional

Name of Pesticide Product: GF-2668 MUP

Received
MAR 28 2011
Registration

NOTICE OF PESTICIDE:
X Registration
__Reregistration
(under FIFRA, as amended)

Name and Address of Registrant (include ZIP Code):

Dow AgroSciences, LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

COMPLIMENTARY COPY

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1) Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data. If required, failure to submit acceptable data to fulfill these requirements may result in registration cancellation in accordance with FIFRA section 6(e).

2) Per the Chemistry Review, you must submit a revised Confidential Statement of Formula addressing the nominal concentrations of the other ingredients in the product before certified limits can be established. The revised CSF must be submitted within 45 days of the date on this notice.

3) The text "EPA Reg. No. 62719-632" must be added to the labeling. Assure that the EPA Establishment Number and Net Contents are also on the label.

4) Per the Chemistry Review, you must generate one-year storage stability (830.6317) and corrosion characteristics (830.6320) data on the product. The observations should be made at 0, 3, 6, 9, and 12 month intervals. The results must be submitted to the Agency in electronic and hard copy format within 15 months of the date on this notice.

SEE NEXT PAGE FOR ADDITIONAL COMMENTS

Signature of Approving Official:
Kathryn V. Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)

Date: MAR 24 2011

5) Per the Acute Toxicity Review, replace the signal word "WARNING" with "WARNING/AVISO, and include additional Spanish language text as follows:

WARNING/AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

6) Per the Acute Toxicity Review, the statement under the Hazards to Humans and Domestic Animals that reads "Causes Substantial But Temporary Eye Injury - Causes Skin Irritation – Harmful If Swallowed – Do not get on skin, in eyes or on clothing." must be replaced with "Causes substantial but temporary eye injury. Harmful if swallowed. Avoid contact with skin or clothing. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet. Remove and wash contaminated clothing before reuse."

7) The following changes must be made to the First Aid box on page 1 of the label:

a) Per the Acute Toxicity Review, the following statements in the order below must replace the proposed "If in eyes", "If on skin or clothing" and "If swallowed" statements. The statements must appear in the First Aid box on page 1 as presented below:

"If in eyes:
- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice."

If swallowed:
- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on skin:
- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice."

b) Per the Acute Toxicity Review, the NOTE TO PHYSICIAN in the First Aid box on page 1 should be expanded to include applicable:
- technical information on symptomology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

SEE NEXT PAGE

c) NOTE: The "First Aid" header and the statement at the bottom of the First Aid box that reads "Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-993-5994 for emergency medical treatment information." must remain on the label.

8) Per the Label Review Manual, the phrases "To the extent permitted by law" and "TO THE EXTENT PERMITTED BY LAW" in the Warranty and Disclaimer section of the label on page 3 must be changed to read "To the extent consistent with applicable law" or "TO THE EXTENT CONSISTENT WITH APPLICABLE LAW".

9) NOTE: While no additional data is being requested at this time, marketing claims made on the pesticide label must be substantiated by data maintained in your files. If data supporting marketing claims made on the product label is not available then those claims must be removed.

10) NOTE: Should you wish to add/retain a reference to the company's website on your label, then please be aware that the website becomes labeling under the Federal Insecticide Fungicide and Rodenticide Act and is subject to review by the Agency. If the website is false or misleading, the product would be misbranded and unlawful to sell or distribute under FIFRA section 12(a)(1)(E). 40 CFR 156.10(a)(5) list examples of statements EPA may consider false or misleading. In addition, regardless of whether a website is referenced on your product's label, claims made on the website may not substantially differ from those claims approved through the registration process. Therefore, should the Agency find or if it is brought to our attention that a website contains false or misleading statements or claims substantially differing from the EPA approved registration, the website will be referred to the EPA's Office of Enforcement and Compliance.

11) Submit one (1) copy of the revised final printed label before the product is released for shipment.

If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

(Label)

GF-2668 MUP

Herbicide

For Manufacturing Use Only

ACCEPTED
with COMMENTS
In EPA Letter Dated:
MAR 24 2011
Under the Federal Insecticide, Fungicide, and Rodenticide Act as amended, for the pesticide registered under EPA Reg. No.
62719-632

Active Ingredient:	
2,4-dichlorophenoxyacetic acid, choline salt	65.3%
Other Ingredients	34.7%
Total	100.0%

Acid Equivalent:
2,4-dichlorophenoxyacetic acid - 44.5% - 4.5 lb/gal

WARNING

Precautionary Statements

Hazards to Humans and Domestic Animals

Causes Substantial But Temporary Eye Injury • Causes Skin Irritation • Harmful If Swallowed

Do not get on skin, in eyes or on clothing.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This product is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For Manufacturing Use Only

Only for formulation into an herbicide for the following uses: aquatic uses, banks of irrigation canals and ditches, barley, bayous, canals, corn (field, sweet, and popcorn), crop stubble, drainage ditches, established grass pastures, fallow land, forestry, lakes, marshes, millet, non-cropland areas, oats, ornamental turfgrass, pistachio orchard floors, pome fruit orchard floors, ponds, rangeland, reservoirs, rice, rivers and streams, rye, sod farms, sorghum-grain sorghum (milo) and forage, soybeans, stone fruit orchard floors, sugarcane, tree nut (excluding filberts) orchard floors, turfgrass grown for seed, and wheat.

Wettable powder formulations must be packaged in water-soluble packages.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

(Storage and Disposal for rigid containers 5 gal or less)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.
Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.
Container Handling: Nonrefillable container. Do not reuse or refill this container.
Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for refillable rigid containers larger than 5 gal)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.
Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.
Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.
Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical,

agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for nonrefillable rigid containers larger than 5 gal)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.
Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.
Container Handling: Nonrefillable container. Do not reuse or refill this container.
Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Warranty Limitations and Disclaimer

Dow AgroSciences warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

To the extent permitted by law, this is the only warranty made on this product. TO THE EXTENT PERMITTED BY LAW, Dow AgroSciences EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. To the extent permitted by law, buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-XXX EPA Est. _____

Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Net Contents _____

EPA accepted __/__/__

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. Diego Fonseca
Regulatory Leader
Regulatory Affairs
Dow AgroSciences, LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

APR 15 2011

Subject: Correction to March 24, 2011 Notice of Registration – Disregard Comment #2
Product Name: GF-2668-MUP
EPA Registration Number: 62719-632
Associated with EPA Decision Number: 439584

Dear Mr. Fonseca:

After conferring with the chemistry reviewer for this action, we have determined that comment 2 in the Notice of Registration for 62719-632 dated March 24, 2011 is not required for this product. Please disregard comment 2 in the Notice of Registration which reads "Per the Chemistry Review, you must submit a revised Confidential Statement of Formula addressing the nominal concentrations of the other ingredients in the product before certified limits can be established. The revised CSF must be submitted within 45 days of the date on this notice."

If you have any questions regarding this correspondence or the Notice of Registration, please feel free to contact Michael Walsh by phone (at 703-308-2972) or via email at walsh.michael@epa.gov.

Sincerely,

Kathryn V. Montague
Product Manager (23)
Herbicide Branch
Registration Division (7505P)

CORRECTING REGISTRATION 62719-632

Note to: File 4/13/11

From: Michael Walsh, RD/Herbicide Branch, Tel: 308-2972

Re: Correction to March 24, 2011 Notice of Registration – Disregarding Comment #2
Product Name: GF-2668-MUP
EPA Registration Number: 62719-632
Associated with EPA Decision Number: 439584

Correcting Error in Notice of Registration

- The registrant contacted Shyam Mathur/TRB Chemistry Team Leader on April 13, 2011 requesting clarification on a requirement cited in the chemistry review conducted for registration of this product.

- The EPA contractor conducting the original chemistry review cited the need for a revised Confidential Statement of Formula to address the nominal concentrations of the other ingredients in the product before certified limits could be established. According to TRB this requirement was made in error and should be disregarded.

- The error was also transferred to the Notice of Registration for this product, and the Notice of Registration and stamped label have been imaged. An appropriate remedy for the situation is to issue a letter instructing the registrant to disregard the requirement.

Material to be added to an e-Jacket/Jacket

Reg. No. 62719-632

Description: NEW PRODUCT
DECISION #: 439584

1. ☐ **Placement within the e-Jacket/jacket:**
   - ☐ **Default: (chronological, top = newest)**
   - ☐ **File Location: (PDF page number, i.e., "before page 45")**

_____

_____

2. ☐ **Send to Data Extraction contractors this material:**
   - ☒ **Newly stamped accepted label**
   - ☐ **Notification**
   - ☐ **New CSF**
   - ☐ **Other:** _____

3. Attach this coversheet to the top of the material or jacket. It must be well organized and clipped together, NOT STAPLED. Then give the material with this coversheet to staff in the Information Services Center (Room S-4900).

Reviewer's Name: MICHAEL WALSH

Phone: 308-297-2 **Division:** RD/HB

Date: 3/24/11

Created August 27, 2008

U.S. ENVIRONMENTAL PROTECTION AGENCY
Office of Pesticide Programs
Registration Division (7505P)
Ariel Rios Building
1200 Pennsylvania Ave., NW
Washington, D.C. 20460

EPA Registration Number:	Date of Issuance:
62719-632	MAR 24 2011

NOTICE OF PESTICIDE:
X Registration
__Reregistration
(under FIFRA, as amended)

Term of Issuance:
Conditional

Name of Pesticide Product:
GF-2668 MUP

Name and Address of Registrant (include ZIP Code):

Dow AgroSciences, LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

Note: Changes in labeling differing in substance from that accepted in connection with this registration must be submitted to and accepted by the Registration Division prior to use of the label in commerce. In any correspondence on this product always refer to the above EPA registration number.

On the basis of information furnished by the registrant, the above named pesticide is hereby registered/reregistered under the Federal Insecticide, Fungicide and Rodenticide Act. Registration is in no way to be construed as an endorsement or recommendation of this product by the Agency. In order to protect health and the environment, the Administrator, on his motion, may at any time suspend or cancel the registration of a pesticide in accordance with the Act. The acceptance of any name in connection with the registration of a product under this Act is not to be construed as giving the registrant a right to exclusive use of the name or to its use if it has been covered by others.

This product is conditionally registered in accordance with FIFRA sec. 3(c)(7)(A) provided that you:

1) Submit and/or cite all data required for registration/reregistration review of your product when the Agency requires all registrants of similar products to submit data. If required, failure to submit acceptable data to fulfill these requirements may result in registration cancellation in accordance with FIFRA section 6(e).

2) Per the Chemistry Review, you must submit a revised Confidential Statement of Formula addressing the nominal concentrations of the other ingredients in the product before certified limits can be established. The revised CSF must be submitted within 45 days of the date on this notice.

3) The text "EPA Reg. No. 62719-632" must be added to the labeling. Assure that the EPA Establishment Number and Net Contents are also on the label.

4) Per the Chemistry Review, you must generate one-year storage stability (830.6317) and corrosion characteristics (830.6320) data on the product. The observations should be made at 0, 3, 6, 9, and 12 month intervals. The results must be submitted to the Agency in electronic and hard copy format within 15 months of the date on this notice.

SEE NEXT PAGE FOR ADDITIONAL COMMENTS

Signature of Approving Official:
Kathryn V. Montague
Product Manager 23
Herbicide Branch
Registration Division (7505P)

Date: MAR 24 2011

5) Per the Acute Toxicity Review, replace the signal word "WARNING" with "WARNING/AVISO, and include additional Spanish language text as follows:

WARNING/AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

6) Per the Acute Toxicity Review, the statement under the Hazards to Humans and Domestic Animals that reads "Causes Substantial But Temporary Eye Injury - Causes Skin Irritation – Harmful If Swallowed – Do not get on skin, in eyes or on clothing." must be replaced with "Causes substantial but temporary eye injury. Harmful if swallowed. Avoid contact with skin or clothing. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses). Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco or using the toilet. Remove and wash contaminated clothing before reuse."

7) The following changes must be made to the First Aid box on page 1 of the label:

a) Per the Acute Toxicity Review, the following statements in the order below must replace the proposed "If in eyes", "If on skin or clothing" and "If swallowed" statements. The statements must appear in the First Aid box on page 1 as presented below:

"If in eyes:
- Hold eye open and rinse slowly and gently with water for 15-20 minutes.
- Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
- Call a poison control center or doctor for treatment advice."

If swallowed:
- Call a poison control center or doctor immediately for treatment advice.
- Have person sip a glass of water if able to swallow.
- Do not induce vomiting unless told to by a poison control center or doctor.
- Do not give anything to an unconscious person.

If on skin:
- Take off contaminated clothing.
- Rinse skin immediately with plenty of water for 15-20 minutes.
- Call a poison control center or doctor for treatment advice."

b) Per the Acute Toxicity Review, the NOTE TO PHYSICIAN in the First Aid box on page 1 should be expanded to include applicable:
- technical information on symptomology;
- use of supportive treatments to maintain life functions;
- medicine that will counteract the specific physiological effects of the pesticide;
- company telephone number to specific medical personnel who can provide specialized medical advice.

SEE NEXT PAGE

c) NOTE: The "First Aid" header and the statement at the bottom of the First Aid box that reads "Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-993-5994 for emergency medical treatment information." must remain on the label.

8) Per the Label Review Manual, the phrases "To the extent permitted by law" and "TO THE EXTENT PERMITTED BY LAW" in the Warranty and Disclaimer section of the label on page 3 must be changed to read "To the extent consistent with applicable law" or "TO THE EXTENT CONSISTENT WITH APPLICABLE LAW".

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If these conditions are not complied with, the registration will be subject to cancellation in accordance with FIFRA sec. 6(e). Your release for shipment of the product constitutes acceptance of these conditions. A stamped copy of the label is enclosed for your records.

(Label)

GF-2668 MUP

Herbicide

For Manufacturing Use Only

Active Ingredient:	
2,4-dichlorophenoxyacetic acid, choline salt	65.3%
Other Ingredients	34.7%
Total	100.0%

Acid Equivalent:
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Wettable powder formulations must be packaged in water-soluble packages.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

(Storage and Disposal for rigid containers 5 gal or less)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Handling: Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for refillable rigid containers larger than 5 gal)

Storage and Disposal

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Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical,

agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for nonrefillable rigid containers larger than 5 gal)

Storage and Disposal

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Warranty Limitations and Disclaimer

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To the extent permitted by law, this is the only warranty made on this product. TO THE EXTENT PERMITTED BY LAW, Dow AgroSciences EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. To the extent permitted by law, buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-XXX EPA Est. _____

Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Net Contents _____

EPA accepted __/__/__

PRIA DUE: 3/28/11 # 62719-AGE

Note to: File
From: Michael Walsh, RD/Herbicide Branch, Tel: 308-2972
Re: New Product Registration, R310
Product Name: GF-2668 MUP
EPA Registration Number: 62719-632 (-AGE)
Submission Date: September 2, 2010
Decision Number: 439584

Action

- Registration of a new 2,4-D MUP product. [redacted]
- No identical or similar product was cited.

TRB Reviews

Chemistry (S. Mathur, March 7, 2011)

- The revised Basic CSF dated March 3, 2011 is acceptable. A revised CSF must be submitted within 45 days to address the nominal concentrations of the other ingredients in the product before certified limits can be established.
- Storage Stability and Corrosion Characteristics (SSCC) studies are required within 15 months of the date on the Notice of Registration. There was some confusion with the registrants submission. SSCC studies are required for this product.
- All other chemistry data is acceptable.

Toxicology (M. Hashim, February 20, 2011)

- The six pack of studies is acceptable.
- Precautionary Statements were included in the review, and are incorporated in the Notice of Registration for this product.
- Per the review, the statements in the First Aid box must be reordered.
- Per the review, the text requiring protective eyewear under the "Hazards to Humans and Domestic Animals" header reads "Protective eyewear (goggles, face shield, or safety glasses)".

Label Comparison

- **Hazards to Humans and Domestic Animals** – per the Acute Toxicity Review.
- **First Aid** – per the Acute Toxicity Review
- **Environmental Hazards** – per the 2,4-D RED.
- **Formulation restrictions** – per the RED.
- **Use Sites** – All of the use sites on the proposed label are listed in the 2,4-D RED; tolerances for food uses confirmed in e-CFR.

FEE

DP BARCODE No.: D382747; **FILE SYMBOL No.**: 62719-AGE; **DECISION No.**: 439584;
PC Code(s): 051505; **Action Code**: R 310; **FOOD Use:** Yes

DATE OUT: March 7, 2011

SUBJECT: Product Chemistry Review for MUP
Product Name: GF-2668 Manufacturing Use Concentrate

FROM: Shyam Mathur
Product Chemistry Team Leader
Technical Review Branch / Registration Division (7505P)

S Mathur 3/7/11

TO: Michael Walsh/ Kathryn Montague, PM 23
Herbicide Branch / Registration Division (7505P)

D. Walsh 3/10/11

Company Name: Dow AgroSciences LLC
Formulation Type: Herbicide

A. INTRODUCTION:

The applicant has submitted an application for registration of a new food use & non-food use manufacturing use product. In support of the application, the applicant submitted product chemistry data corresponding to guideline 830 series, group A & group B (MRIDs 482083-01 and 482083-02). A CSF for a basic formulation (dated 8/19/2010) was submitted along with the product label. On the advice of the Agency, the registrant submitted a revised & corrected basic CSF dated March 3, 2011 by e-mail on 03-04-11, which will supersede the previously provided basic CSF dated August 19, 2010. The primary product chemistry review was performed by Oak Ridge National Laboratory, Oak Ridge, TN, USA. TRB has been asked to determine the acceptability of the product chemistry data and the proposed CSF.

B. SUMMARY OF FINDINGS:

1. Name of Active Ingredient(s): Choline salt of 2, 4-D (65.3%)

2. All the source materials for the active ingredients are derived from registered sources:
[ ] Yes; [X] No

Note: The active ingredient was obtained by an [redacted]

3. All inert ingredients have been screened by IIAB and found to be approved for the proposed labeled uses
[X] Yes; [ ] No.

4. Confidential Statement of Formula(s):

[X] Basic - Dated: August 19, 2010; Resubmitted (email dated 03-04-11) – Dated: 03-03-11

[ ] Alternate # 1 - Dated:

Is the alternate CSF in compliance with 40CFR§152.43?
[ ] Yes; [ ] No; [X] NA

Manufacturing process information may be entitled to confidential treatment

5. Product label

a. Ingredient statement: Nominal concentration of AI listed on CSF(s) concurs with product label (PR Notice 91-2)

[X] Yes, if not, explain below:

Metallic equivalent: [ ] Yes [X] NA;
Soluble arsenic: [ ] Yes [X] NA
Isomeric ratios: [ ] Yes [X] NA
Acid equivalent: [X] Yes [ ] Name of the acid ; 2, 4-D acid equivalent = 44.5 %

b. Health related sub statements: Product contains?

Petroleum distillate at > 10%: [ ] Yes [X] No [ ] NA
Methanol at > 4%: [ ] Yes [X] No [ ] NA

c. Physical chemical hazard statement: Product label requires a statement per 40 CFR §156.78 for: flammability, explosive potential or electric insulator breakdown?
[ ] Yes [X] No

Is the sub statement in compliance with PR Notice 97-6? [X] Yes, if not, explain below:

d. Label requires an additional Storage and Disposal statement: [ ] Yes [X] No; if yes explain below:

DP BARCODE No.: D382747; **FILE SYMBOL No.**: 62719-AGE; **DECISION No.**: 439584;
PC Code(s): 051505; **Action Code**: R 310; **FOOD Use:** Yes

6. Group **A**: Product Chemistry Data

TRB's determination of the acceptability of the data for the proposed product is listed in the tables below.

Guideline No.	Study Title		Data submitted		TRB's Assessment of Data	MRID Nos.
			Yes	No		
830.1550	Product Identity & Composition		X		A	482083-01
830.1600	Description of materials used to produce the product		X		A	482083-01
830.1650	Description of formulation process		X		A	482083-01
830.1670	Discussion on the formation of impurities		X		A	482083-01
830.1700	Preliminary analysis			X	NA	
830.1750	Certified limits (158.350)	Standard certified limits	X		A	CSF (03-03-11)
		Proposed Limits				
		Justification for wider limits				
830.1800	Enforcement analytical method		X		A	482083-01

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver Request, I = In Progress,
NA = Not Applicable

7. Group **B:**

Guideline No.	Study Title	Value or Qualitative Description	TRB's Assessment of Data	MRID Nos.
830.6303	Physical State	Liquid	A	482083-02
830.6315	Flammability	Flashpoint >100°C	A	482083-02
830.6316	Explodability	Does not contain explosive ingredients	NA	482083-02
830.7000	pH	4.77 (1% solution in distilled water at 24.7°C) 6.8 - 7.2	A*	482083-02 CSF
830.7300	Density (units)	1.2125 g/mL at 20.0°C	A	482083-02

A = Acceptance, N = Not Acceptable, G = Data Gap, W = Waiver request, NA = Not applicable, I = In progress

* The registrant explained that the pH value 4.77 is measured is for 1% solution; whereas the value of 6.8 to 7.2 is for the concentrated product without dilution.

DP BARCODE No.: D382747; **FILE SYMBOL No.**: 62719-AGE; **DECISION No.**: 439584;
PC Code(s): 051505; **Action Code**: R 310; **FOOD Use:** Yes

C. CONCLUSIONS:

The TRB has reviewed the CSF(s) and product chemistry data for the proposed end use product and has concluded:

1. The proposed revised CSF for basic formulation (dated 03-03-11) is acceptable.

2. The data submitted corresponding to guideline 830.1600 (description of materials used to produce the product), 830.1650 (description of the formulation process), and 830.1670 (discussion of the formation of impurities) are acceptable.

3. The data submitted corresponding to guideline 830.1750 (certified limits) are acceptable for the active ingredient only. The nominal concentration of the other ingredients in the product must be corrected on the CSF before certified limits can be established.

4. The data submitted corresponding to guidelines 830.6302 (color), 830.6303 (physical state), 830.6304 (odor), 830.6314 (oxidation / reduction: chemical incompatibility), 830.6315 (flammability), 830.7100 (viscosity), and 830.7300 (density) are acceptable.

5. The explanation provided for the variation of pH values on the CSF and the data is acceptable. The pH value given as 4.77 in MRID 482083-02 is for the concentrated product and as 6.8 - 7.2 value for pH is for the 1% solution of the product.

6. No data were submitted for guidelines 830.6317 (storage stability) and 830.6320 (corrosion characteristics). The registrant states incorrectly that a storage stability test is not required. The registrant also states that corrosion characteristics will be addressed in a separate report. Storage stability and corrosion characteristics tests must be conducted. It is recommended that the observations should be made at 0, 3, 6, 9, and 12 month intervals.

7. The proposed label was screened as it pertains to the product chemistry requirements. The final review of the proposed label and uses are the purview of the RM team.

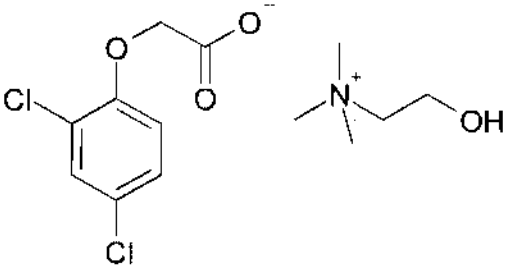
OPPTS 830.1550 Product Identity and Composition

Information on Product Identity and Composition

Product Name: GF-2668 Manufacturing Use Product
EPA Registration Number: 62719-XXX

	w/w%
2,4-D Choline Salt (62719-XXX)	65.3

Chemical Structure:



Chemical Name: 2-hydroxy-N,N,N-trimethylethanaminium-(2,4-dichlorophenoxy)acetate
CAS #: 1048373-72-3
Molecular Weight: 324.7

Inerts	34.7
Total	100.0

DATA EVALUATION RECORD

ETHANAMINIUM
(GF-2668 Manufacturing Use Concentrate)

STUDY TYPES: **Product Identity and Composition (OPPTS 830.1550)**
Description of Materials Used to Produce the Product (OPPTS 830.1600)
Description of Production Process (830.1620)
Discussion of Formation of Impurities (OPPTS 830.1670)
Preliminary Analysis (OPPTS 830.1700)
Certified Limits (OPPTS 830.1750)
Enforcement Analytical Method (OPPTS 830.1800)
Physical and Chemical Characteristics (OPPTS 830.6302-830.7950)

MRIDs 482083-01 and 482083-03

Prepared for
Registration Division
Office of Pesticide Programs
U.S. Environmental Protection Agency
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

Prepared by
Toxicology and Hazard Assessment Group
Environmental Sciences Division
Oak Ridge National Laboratory
Oak Ridge, TN 37831
Task Order No. 1-67

Primary Reviewer:
Eric B. Lewis, M.S.

Signature: Eric B. Lewis
Date: JAN 1 1 2011

Secondary Reviewers:
Sylvia Milanez, Ph.D., D.A.B.T.

Signature: Sylvia Milanez
Date: JAN 1 1 2011

Robert H. Ross, M.S., Group Leader

Signature: Robert H. Ross
Date: JAN 1 1 2011

Quality Assurance:
Kimberly G. Slusher, M.S.

Signature: Kimberly G. Slusher
Date: JAN 1 1 2011

Disclaimer

This review may have been altered subsequent to the contractor's signatures above.

Oak Ridge National Laboratory managed and operated by UT-Battelle, LLC., for the U.S. Department of Energy under Contract No. DE-AC05-00OR22725.

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

308/2E
March 8, 2011

Dow AgroSciences

Document Processing Desk
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

GF-2668 MANUFACTURING USE CONCENTRATE (AI: 2,4-D)
EPA REGISTRATION NUMBER: 62719-AGE
REPLACEMENT CONFIDENTIAL STATEMENT OF FORMULA

Enclosed is a proposed replacement Confidential Statement of Formula (CSF) for GF-2668 Manufacturing Use Concentrate Herbicide replacing the CSF submitted September 2, 2010 and currently under review by the Agency.

Contents of Submission

- Transmittal document (this letter)
- Replacement Basic Confidential Statement of Formula for GF-2668 Manufacturing Use Concentrate dated March 3, 2011
  (2 Pages) (2 Originals)
- Complimentary Copy of email sent to Shyam Mathur dated March 4, 2011

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827 (kahipsky@dow.com).

Sincerely,

Diego Fonseca/cal

Diego Fonseca
Regulatory Leader - Regulatory Affairs
317-337-4693
317-337-4649 (FAX)
dfonseca@dow.com

Enclosures

DF/kh

Hipsky, Kerri (KA)

From: Fonseca, Diego (D)
Sent: Friday, March 04, 2011 2:48 PM
To: mathur.shyam@epa.gov
Cc: Hipsky, Kerri (KA)
Subject: GF-2668 CSF Basic (EPA File Symbol 62719-AGE)
Attachments: GF-2668.pdf

Dear Shyam.

Please find attached the new CSF Basic for GF-2668, which has been corrected as per your indications. This is:

- Box #3: "Manufacturing", spelling corrected.
- Box #8: Defined pH value on CSF Basic. No changed, please see clarification note added to CSF page 2. CSF attached shows 6.8 – 7.2 as the real value for the concentrated product. The pH 4.77 as shown in the study (MRID No. 48208302), is the value for a measured 1% dilution.
- Total number for column 13 b, reads now **100.0 %** instead of 100.0

An original and a copy of this CSF are being sent via mail to the PM Kathryn Montague.
Hope these corrections fully address the CSF Basic for GF-2668. If no, please do not hesitate to either contact me at my office phone or to Kerri Hipsky at 317 337-7872.

Sincerely,

Diego Fonseca
Regulatory
Ph: 317 337-4693
Fax: 317 337-4649
dfonseca@dow.com

GF-2668 CSF Basic (EPA File Symbol 62719-AGE)
Fonseca, Diego (D)
to:
Shyam Mathur
03/04/2011 02:48 PM
Cc:
"Hipsky, Kerri (KA)"
Show Details

Dear Shyam.

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Hope these corrections fully address the CSF Basic for GF-2668. If no, please do not hesitate to either contact me at my office phone or to Kerri Hipsky at 317 337-7872.

Sincerely,

Diego Fonseca
Regulatory
Ph: 317 337-4693
Fax: 317 337-4649
dfonseca@dow.com

PC Code; 051505
File Symbol #GF-2668 MUP

UNITED STATES ENVIRONMENTAL AGENCY PROTECTION
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY AND
POLLUTION PREVENTION

February 20, 2011

MEMORANDUM

Subject:	Name of Pesticide Product	**GF-2668 MUP**
	EPA File Symbol:	62719-AGE
	DP Barcode:	382750
	Decision No.:	439584
	Action Code:	R310
	P.C. Codes:	051505

From: Masih Hashim, Team Leader-Toxicology
Technical Review Branch
Registration Division (7505P)

To: Michael Walsh, RM Team 23
Herbicide Branch
Registration Division (7505P)

Applicant: Dow Chemical Company
Midland, MI 48674

FORMULATION from LABEL:

Active ingredient:	% wt.
2,4-dichlorophenoxyacetic acid, choline salt	65.3
Inert Ingredients:	34.7
Total:	100.0

ACTION REQUESTED: The Risk Manager requests a review of the acute toxicity data (MRIDs 48208303-08) submitted to support the application of a new Product ##62719-AGE, a herbicide.

BACKGROUND: Dow Chemical has submitted a six pack of toxicity studies for registration of of GF-2688 MUP. The toxicology was performed at Product Safety Labs and Dow's Laboratories: Toxicology & Environmental Research and Consulting, at Midland, MI. This product is for Manufacturing use only.

RECOMMENDATIONS: Each of the six toxicity studies is in accordance with the Sub-Division F guidelines.

The acute toxicology profile for #62719-AGE is as follows:

Acute oral toxicity	III	acceptable	MRID 48208303
Acute dermal toxicity	IV	acceptable	MRID 48208304
Acute inhalation toxicity	IV	acceptable	MRID 48208305
Primary eye irritation	II	acceptable	MRID 48208306
Primary skin irritation	III	acceptable	MRID 48208307
Dermal sensitization	neg.	acceptable	MRID 48208308

The CSF should be approved by the Product Chemistry Team.

Label Review System

The product to be used for formulation only

PRODUCT ID #: 062719-00632

PRODUCT NAME: GF-2668 MUP

PRECAUTIONARY STATEMENTS

SIGNAL WORD: WARNING

SPANISH SIGNAL WORD: AVISO

Si usted no entiende la etiqueta, busque a alguien para que se la explique a usted en detalle.
(If you do not understand the label, find someone to explain it to you in detail.)

Hazards to Humans and Domestic Animals:

Causes substantial but temporary eye injury. Harmful if swallowed. Avoid contact with skin or clothing. Do not get in eyes or on clothing. Wear protective eyewear (goggles, face shield, or safety glasses).

Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, or using tobacco/using toilet. Remove and wash contaminated clothing before reuse.

First Aid:

If in eyes:
-Hold eye open and rinse slowly and gently with water for 15-20 minutes.
-Remove contact lenses, if present, after the first 5 minutes, then continue rinsing.
-Call a poison control center or doctor for treatment advice.

If swallowed:
-Call a poison control center or doctor immediately for treatment advice.
-Have person sip a glass of water if able to swallow.
-Do not induce vomiting unless told to by a poison control center or doctor.
-Do not give anything to an unconscious person.

If on skin:
-Take off contaminated clothing.
-Rinse skin immediately with plenty of water for 15-20 minutes.
-Call a poison control center or doctor for treatment advice.

NOTE TO PHYSICIAN: Note to PM/CRM/Registrant: The proposed label should contain a "Note to Physician". The following statements are suggested types of information that may be included, if applicable: - technical information on symptomatology; - use of supportive treatments to maintain life functions; - medicine that will counteract the specific physiological effects of the pesticide; - company telephone number to specific medical personnel who can provide specialized medical advice.

Have the product container or label with you when calling a poison control center or doctor or going for treatment. You may also contact 1-800-xxx-xxxx for emergency medical treatment information.

Reviewer: M Hashim **Date:** Feb 14, 2011

Risk Manager (EPA): 23

STUDY TYPE: Acute Oral Toxicity Rat; OPPTS 870.1100; OECD 425

TEST MATERIAL: GF- 2668 (wt. 65.5% 2,4-D choline salt), Lot #E3263-35-1, TSN033077-0001

CITATION: Durando, J. (2010). GF- 2668. Acute Toxicity Study in Rats. Study Number 29518, dated 6-28-10 . Eurofins/Product Safety Laboratories, Dayton, New Jersey, MRID 48208303. Unpublished

SPONSOR: Dow Chemical Company, Midland, MI 48674

EXECUTIVE SUMMARY: In an acute oral toxicity study (MRID 48208303), young adult, female F-344 rats (source: Harlan, Indianapolis, IN, age 9-11 wks old. wt.124-141g) were given a single oral dose of the undiluted test material GF-2668 at 550 mg/kg. This animal lived. The remaining animals were dosed in accordance with the Up and Down Procedure (Main test) up to 2190 mg/kg. Animals were observed for 14 days. All animals were checked for signs of toxicity until termination. Weights were taken at 7 and 14 days for the surviving animals.

550 mg/kg- All animals survived the test. No signs of gross toxicity, or abnormal behavior were seen at his dose level. Animals gained body weight throughout the study. There were no lesions at necropsy. At 1100 mg/kg 2 animals died within one day of test administration. Prior to death animals were hypoactive and/or showed hunched posture, or red ocular discharge. The surviving animals showed no toxic signs, and gained normal body weight. These animals showed no gross lesions at necropsy. The decedents at necropsy showed red intestines. At 2190 mg/kg, one animal was dosed it died within 30 minutes after the dosage. Animal was hypoactive and showed prone posture. Gross necropsy showed red intestines.

LD_{50} of the female rats =1100 mg/kg (table next page).

Based on the oral LD_{50}, GF-2668, is in EPA Toxicity Category III.

This study is classified as acceptable. It does satisfy the guideline requirements for an acute oral study (OPPTS 870.1100; OECD 425).

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Dosing sequence	Main test Animals No.	Dose level mg/kg	Short term outcome	Long-term outcome
1	3101	550	S	S
2	3102	1100	S	S
3	3103	2190	D	D
1	3104	1100	D	D
2	3105	550	S	S
3	3106	1100	D	D

A. **Mortality:** Two animals died at 1100 mg/kg on the first day. One animal died at 2190 mg/kg (only one animal dosed here).

B. **Clinical observations/ necropsy** All animals survived the test at 550 mg/kg. At 1100 mg/kg 2 dead animal (prior to death) were hypoactive and/or showed hunched posture, or red ocular discharge The surviving animals showed no toxic signs and gained normal body weight throughout the study. At 2190 mg/kg, one animal was dosed, it died within 30 minutes of dosage. Animal was hypoactive and showed prone posture.

C. **Necropsy:** There were no gross lesions at necropsy for 550 mg/kg. All decedents, 1100 mg/kg, at necropsy showed red intestines (2 animals). These surviving animals showed no gross lesions at necropsy. At 2190 mg/kg (only one animal) showed slightly red intestine at necropsy.

D. **Reviewer's conclusions:** The LD50 for this test article in female rats is 1100 mg/kg. This places the test material GF-2668 in EPA Tox Category III.

Test/Substance: Enter test description.
Test type: Main Test
Limit dose (mg/kg): 5000
Assumed LD50 (mg/kg): 1100 mg/kg
Assumed sigma (mg/kg): 0.3

Recommended dose progression: 5000, 1750, 550, 175, 55, 17.5, 5.5, 1.75

DATA:

Test Seq.	Animal ID	Dose (mg/kg)	Short-term Result	Long-term Result
1	3101	550	O	O
2	3102	1100	O	O
3	3103	2190	X	X
4	3104	1100	X	X
5	3105	550	O	O

6	3106	1100	X	X

(X = Died, O = Survived)

Dose Recommendation: Dose the next animal at 550 mg/kg.

SUMMARY OF LONG-TERM RESULTS:

Dose	O	X	Total
550	2	0	2
1100	1	2	3
2190	0	1	1
All Doses	3	3	6

Statistical Estimate based on long term outcomes:

The estimated LD50 and confidence interval(s) are preliminary because no stopping criteria were met.

Estimated LD50 = 1100 (The one dose with partial response).
95% PL Confidence interval is 374.8 to 2560.

Reviewer: M Hashim **Date:** Feb 14, 2011
Risk Manager (EPA): 23

STUDY TYPE: Acute Dermal Toxicity – Rat; OPPTS 870.1200; OECD 402

TEST MATERIAL: GF- 2668 (wt. 65.5% 2,4-D Choline salt), Lot #E3263-35-1, TSN033077-0001
CITATION: Durando, J. (2010). GF- 2668. Acute Dermal Toxicity Study in Rats. Study Number 29519, dated 6-28-10. Eurofins/Product Safety Laboratories, Dayton, New Jersey, MRID 48208304. Unpublished

SPONSOR: Dow Chemical Company, Midland, MI 48674

EXECUTIVE SUMMARY: An acute dermal toxicity study (MRID 48208304) was conducted in Fischer 344 rats to determine the potential of GF-2688 to produce toxicity from a single topical application. Five/sex young adult rats, 9-11 wks old (source, Harlan, Indianapolis, IN, wt. males: 231-240g, females: 140-146g) were used for this test. The females were first exposed to a limit dose of the test material at 5000 mg/kg (as received) for 24 hours. One female died, then five males were exposed to the same dose. The test material was applied to the application site on the (clipped) dorsal trunk, measuring approximately 2 inches by 3 inches (~ 10% of the body surface area), using a 4-ply gauze pad secured with 3-inch Durapore tape which was wrapped around the trunk. The animals were observed for 14 days.

One female died within 2 days of test application. Prior to death this animal was hypoactive, showed irregular respiration, and dermal irritation: eythema and edema. Another female showed irregular respiration but recovered by day 4. Dermal irritation was also noted on 3 surviving females and all males between days 1-5. Two males showed reduced fecal volume between days 7-8. Necropsy showed red lungs and intestines in the decedent. No other gross lesions were seen in any of the animals.

LD_{50} Males > 5000 mg/kg bw
LD_{50} Females > 5000 mg/kg bw
LD_{50} Combined > 5000 mg/kg bw

Based on the dermal LD_{50} GF- 2668 is in Toxicity Category IV.

This study is classified as acceptable. It does satisfy the guideline requirements for an acute dermal study (OPPTS 870.1200; OECD 402) in the rat.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Dose (mg/kg bw)	Mortality/Number Tested		
	Males	Females	Combined
5000	0/5	1/5	1/10

A. Mortality: One of 5 females died within 2 days of test application

B. Clinical observations: . Prior to death this animal was hypoactive, showed irregular respiration and dermal irritation, eythemal and edema. Another female showed irregular respiration but recovered by day 4. Dermal irritation was also noted on 3 surviving females and all males between days 1-5. Two males showed reduced fecal volume between days 7-8.

C. Gross necropsy: Necropsy showed red lungs and intestines in the decedent. No other gross lesions were seen in any of the animals.

D. Reviewer's conclusions: Acute dermal LD_{50} for GF-2668 in males/females rats is > 5000 mg/kg bw. This places the test material in EPA Toxicity Category IV.

Reviewer: M Hashim **Date:** Feb 10, 2011

Risk Manager (EPA): 23

STUDY TYPE: Acute Inhalation Toxicity Study in Rats; OPPTS 870.1300

TEST MATERIAL: GF- 2668 (wt. 65.5% 2,4-D choline salt), Lot #E3263-35-1; TSN033077-0001

CITATION: Krieger, S.M., and Garlinghouse,C.R. 2010. GF- 2668. Acute Liquid Aerosol Inhalation Toxicity Study in F344/DuCrl Rats. Project Number 101046, dated 6-16-10. Toxicology and Environmental Research and Consulting (Laboratory), Midland , MI 48674, MRID 48208305. Unpublished

SPONSOR: Dow Chemical Company, Midland, MI 48674

EXECUTIVE SUMMARY: In an acute inhalation toxicity study (MRID 48208305), five male and five female young adult, F344/DuCrl rats (age 9 weeks old source Charles River Labs, Kingston, NY, wt. males: 190-198g, , females:126-131g were exposed (nose-only) to the aerosolized test substance, GF-2668, for 4 hours. The mean gravimetric concentration was 5.22 mg/L with an MMAD of 1.88 µm, GSD was 2.32. The animals were observed for abnormal signs for 14 days post exposure.

There were no deaths on the study. All animals appeared normal during and post exposure. There was loss of body weights (4.0 and 4.8%) both in male and female rats, respectively, on day 2, recovering on day 4. No gross lesions were seen at necropsy.

LC_{50} Males> 5.22 mg/L
LC_{50} Females > 5.22 mg/L
LC_{50} Combined > 5.22 mg/L

Based on the 4-hour inhalation LC50 GF-2688 is in EPA Toxicity Category IV.

This study is classified as acceptable. It does satisfy the guideline requirements for an acute inhalation study (OPPTS 870.1300; OECD 403) in the rat.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Gravimetric Conc. (mg/L)	MMAD µm	GSD	Mortality/Number Tested		
			Males	Females	Combined
5.22	1.88	2.32	0/5	0/5	0/10

Test atmosphere / Chamber description Nose-only inhalation chamber

Gravimetric Conc. (mg/L):	5.22
Chamber Volume (L):	42
Mean Total Airflow (L/min)	30
Temperature-chamber	21 ° C
Relative Humidity	40.7%

Particle size determination: Samples withdrawn from the breathing zone of the animals were analyzed using an eight-stage Andersen cascade impactor to determine the particle size distribution of the test atmosphere.

A. Mortality: All animals survived the test.

B. Clinical observations: All animals appeared normal during and post exposure. There was loss of body weights (4.0 and 4.8%), respectively, both in male and female rats on day 2, recovering on day 4.

C. Gross necropsy: No gross lesions were seen at terminal necropsy.

D. Reviewer's conclusions: The LC_{50} for males / females for the test article is greater than 5.22 mg/L. This places the test material in EPA Toxicity Category IV.

Reviewer: M Hashim **Date:** Feb 14, 2011
Risk Manager (EPA): 23

STUDY TYPE: Primary Eye Irritation Study in Rabbits ; OPPTS 870.2400

TEST MATERIAL: GF- 2668 (wt. 65.5% 2,4-D choline salt), Lot #E3263-35-1, TSN033077-0001, clear amber liquid, pH 7.0
CITATION: Durando, J. (2010). Study Number 29520, dated 6-28-10. Eurofins/Product Safety Laboratories, Dayton, New Jersey. MRID 48208306 . Unpublished

SPONSOR: Dow Chemical Company, Midland, MI 48674

EXECUTIVE SUMMARY: In a primary eye irritation study (MRID 48208306), 0.1 mL of the undiluted test material GF- 2688 was instilled into the conjunctival sac of the right eye of each of the three young adult male NZW rabbits (source: Robinson Services, Clemmons, NJ, age 14-16 wks). The left eye of each animal served as the control. Treated eyes were scored according to the Draize Method at 1, 24, 48, 72 hours, and up to 17 days following the test material instillation.

There was eye irritation within an hour of test article instillation, leading to corneal opacity, iritis, and conjunctivitis. One treated eye also showed white discharge during 72 hrs to day 7. Irritation was limited to conjunctivitis only in 2/3 animals on day 14, and by day 17 irritation subsided in all animals

In this study GF-2688 was severely irritating to the rabbit eye. The highest maximum mean total score (MMTS) was 28.7 at one hour, 30.3 at 24 hrs, and subsided to 0 on day 17. GF-2688 is classified as EPA Toxicity Category II for primary eye irritation.

This study is classified as acceptable. It does satisfy the guideline requirements for a primary eye irritation study (OPPTS 870.2400; OECD 405) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Time, Post instillation	Incidence of eye irritation			
	Corneal opacity	*Iritis*	*Conjunctivitis*	*Irritation(severity) mean score*
1 hour(s)	3/3	3/3	3/3	28.7
24	3/3	3/3	3/3	30.3
48	3/3	3/3	3/3	30.3
72	3/3	3/3	3/3	26.3
day 4	3/3	3/3	3/3	21.7
7	2/3	2/3	3/3	15.3
10	1/3	1/3	3/3	8.7
14	0/3	0/3	2/3	2.0
17	0/3	0/3	0/3	0.0

A. **Observations:** There was eye irritation within an hour of test substance instillation, leading to corneal opacity, iritis, and conjunctivitis. One treated eye also showed white discharge during 72 hrs-day 7. Irritation was limited to conjunctivitis only in 2/3 animals on day 14, and by day 17 it subsided to 0 in all animals.

B. **Reviewer's conclusions:** The product GF-2688 is severely irritating and is classified in EPA Toxicity Category II for primary eye irritation.

Reviewer: M Hashim **Date:** Feb 14, 2011
Risk Manager (EPA): 23

STUDY TYPE: Primary Skin Irritation Study in Rabbits: OPPTS 870.2500, OECD 404

TEST MATERIAL: GF- 2668 (wt. 65.5% 2,4-D choline salt), Lot #E3263-35-1, TSN033077-0001, pH 7

CITATION: Durando, J. (2010). GF-2668. Primary Skin Irritation Study in Rabbits. Study Number 29521, dated 6-28-10. Eurofins/Product Safety Laboratories, Dayton, New Jersey, MRID 48208307. Unpublished

SPONSOR: Dow Chemical Company, Midland, MI 48674

EXECUTIVE SUMMARY: In a primary dermal irritation study (MRID 48208307), three healthy young adult female NZW rabbits (source: Robinson Services Clemmons, North Carolina) were dermally exposed to 0.5 ml of the test material for 4 hours. The test material was applied to 6-cm^2 sites on the trunk. The dressing was secured by a 4-ply gauze pad and semi-occlusive 3-inch Micropore tape wrapped around the trunk. The sites were scored at 1, 24, 48, 72 hours, and at 7 and 10 days following patch removal. Irritation at the test sites was scored according to the Draize method.

The test caused very slight to moderate/severe erytema and very slight to slight edema. Desquamation was there on one site from 72 hrs to day 10. All animals were free of erythema and edema by day 10.

In this study, GF-2688 is slightly irritating to the rabbit skin. It is classified as EPA Toxicity Category III for primary dermal irritation. PDII 3.1.

This study is classified as acceptable. It does satisfy the guideline requirements for a primary dermal irritation study (OPPTS 870.2500; OECD 404) in the rabbit.

COMPLIANCE: Signed and dated GLP, Quality Assurance and Data Confidentiality statements were provided.

RESULTS and DISCUSSION:

Animal Number	Sex	Erythema/Edema Time after patch removal					
		< 1hr	24hrs	48 hrs	72 hrs	Dqy7	Day 10
3501	female	3/2	2/2	1/0	0/0	0/0	0/0
3502	female	3/2	3/2	1/0	1/0	1/0	0/0
3503	female	3/2	3/2	2/1	2/1	1/0	0/0
Total		9/6	8/6	4/1	3/1	2./0	0/0
Mean		3.0/2.0	2.7/2.0	1.3/0.3	1.0/0.3	0.7/0.0	0.0/0.0

A. **Observations:** The test caused very slight to moderate/severe erytema and very slight to slight edema. The test caused very slight to moderate/severe erythema and very slight to slight edema. Desquamation was present on one site from 72 hrs to day 10. All animals were free of erythema and edema by day 10.

B. **Results:** Based on the 72 hrs mean score, the product is a moderate irritant, as is classified in tox category III. PDII was 3.1.

C. **Reviewer's conclusions:** In agreement with the study author, the test material is classified as EPA Toxicity Category III for primary dermal irritation in rabbits.

Reviewer: M Hashim **Date:** Feb 14, 2011

Risk Manager (EPA): 23

STUDY TYPE: Dermal Sensitization – Local Lymph Node Assay in CBA/J Mice; OPPTS 870.2600; OECD 429

TEST MATERIAL: GF- 2668 (wt. 65.5% 2,4-D choline salt), Lot #E3263-35-1, TSN033077-0001

CITATION: Boverhof, D.R., and Sosinski, L.K. 2010. GF- 2668. Project Number 101043, dated 6-16-10. Toxicology and Environmental Research Laboratory, Dow Chemical, MI 48674. MRID 48208308 Unpublished

SPONSOR: Dow Chemical Company, Midland, MI 48674

EXECUTIVE SUMMARY: LLNA was conducted (MRID 48208308) to assess the sensitization potential of GF-2688 in female CBA/J mice (age 9-12 weeks, wt. 20-23g source: Harlan, Indianapolis, IN). The LLNA measures the proliferative response of lymph nodes calculated as the ratio of ^{3}H-methyl thymidine incorporation into lymph nodes of test group animals relative to the control group. Pre-screening tests were performed and proper doses were selected. In addition a vehicle control (1% L92), and 30% HCA (positive control) were used. Weights were recorded on all mice. A substance is regarded as a sensitizer if at least one concentration of the test item results in SI of ≥3. Three test groups (5%, 25% or 50%), with 6 mice/group were topically applied with 25µL of the test material to the dorsal surface of each ear, once daily for three consecutive days. Five days after the first application all mice were dosed with 20 µCi ^{3}H-methyl thymidine by intravenous injection. On day 6, all mice were euthanized, their lymph nodes were excised to measure the uptake of ^{3}H-methyl thymidine (in the auricular lymph nodes) by draining them at 5 hours post application. The conduct of the assay was evaluated by measuring the values of positive control for which the Stimulation Index (SI) should be > 3.

The SI values for the test article were <3 at any concentration: 1.3, 1.2 and 1.1 for 5%, 25% and 50%, respectively. There was no erythema, and body weights were not affected in any of the groups.

GF-2688 is not a sensitizer.

This study is classified as acceptable and meets requirements of the OPPTS 870. 2600, OECD 429.

Procedure:

A **Induction** LLNA was conducted to assess the sensitization potential of GF-2688 in female CBA/J mice Screening tests were performed, and proper doses were selected. In addition a vehicle control group was used. Three test groups (5%, 25% or 50%), with 6 mice/group were topically applied with 25µL of the test material to the dorsal surface of each ear, once daily for three consecutive days. The LLNA measures the proliferative response of lymph nodes calculated as the ratio of ^{3}H-methyl thymidine incorporation into lymph nodes of test group animals relative to control group animals.

B. **Challenge:** Five days after the first application all mice were dosed with 20 µCi ^{3}H-methyl thymidine (a radioisotope) by intravenous injection. On day 6, all mice were euthanized, their lymph nodes were excised to measure the uptake of the radioisotope (in the auricular lymph nodes) by draining them at 5 hours post application.

C. **Controls:** A vehicle group and a positive control group was selected using, 1% L92 for the vehicle, and 30% HCA for positive control.

RESULTS and DISCUSSION:

A. **Reactions and durations:** Disintegration /minute (DPM) presented in table 1, (next page). Results indicated that the SI values for the test article were 1.3, 1.2 and 1.1 for 5%, 25% and 50%, respectively. There were no statistically significant increases in cell proliferation measurements in the test groups compared to the vehicle control group at any test concentration.

There was no erythema, and body weights were not affected in any of the groups.

B. **Positive control:** The results of the positive control study using a 30% concentration of HCA were appropriate, SI was 4.3.

Table 1. Disintegration/minute (DPM) and Stimulation Index (SI) for the test article (GF-2668), and the controls (MRID48208308)

Dose	Animal Nos.	Average DPM (S.D)	S.I (mean) (S.D)
Vehicle 1% L92	2851 to 2856	580.67 (254.76)	1.0 (0.4)
30% HCA	2857 to 2862	2487.5 (1263.6)	4.3* (2.2)
5% GF-2668	2887 to 2892	776.17 (291.27)	1.34 (0.5)
25%GF-2668	2893 to 2898	690.33 (146.57)	1.2 (0.3)
50% GF-Gf2668	2899 to 2904	650.67 (248.75)	1.14 (0.4)

*Note: SI >3 is positive

DP BARCODE: 382750
2. **PC CODES:** 051505
3. **CURRENT DATE:** 2-20- 11
4. **TEST MATERIAL:** GF-2668 MUP

Study/Species/Lab Study # / Date	MRID	Results	Tox. Cat.	Core Grade
Acute oral toxicity/rat Eurofins/Product Safety Laboratories Study # 29518/6-28-10	48208303	LD_{50} Females = 1100 mg/kg bw	III	A
Acute dermal toxicity/rat Eurofins/Product Safety Laboratories Study #29519/6-28-10	48208304	LD_{50} Males > 5000 mg/kg bw LD_{50} Females > 5000 mg/kg bw LD_{50} Combined > 5000 mg/kg	IV	A
Acute inhalation toxicity/rat Dow Chemical/tox Lab/ Study #101046 /6-16-10	48208305	LC_{50} Males > 5.22 mg/L LC_{50} Females > 5.22 mg/L LC_{50} Combined > 5.22 mg/L	IV	A
Primary eye irritation/rabbit Eurofins/Product Safety Laboratories Study # 29520/6-28-10	48208306	Severely irritating	II	A
Primary skin irritation/ rabbit Eurofins/Product Safety Laboratories Study #29521/ 6-28-10	48258307	Moderately irritating	III	A
Dermal sensitization/LLNA-mice Dow Chemical/tox Lab/ Study #101043/6-16-10	48208308	Not a sensitizer	--	A

Core Grade Key: A = Acceptable, S = Supplementary, U = Unacceptable, W = Waived

21-Day Screen Completed by Contractor

21-Day Expires on 9-28-10

Jacket # 62719-AGE
MRID# 482083

Content Screen: Recommended to Pass/Fail

See Pg. 3 / Emails.
Data missing

86-5 Review: Passed/Failed/NA

All now have MRID #s + updated 9/24

Transfer This Jacket to:

Stephen Schaible

PM 23

RE: EPA Product Update for 62719-AGE (E-sub MRID 482083)
Wilkinson Unugboji to: Hipsky, Kerri (KA) 09/17/2010 09:12 AM

Your welcome.

Unugboji Wilkinson
Data Analyst - MacFadden/EPA Contractor
One Potomic Yard
2777 S.Crystal Drive, S-6921
Arlington, VA 22202
Tel:(703).347.8518
Fax:(703)305.5060
EPA mail: unugboji.wilkinson@epa.gov

"Hipsky, Kerri (KA)" Unugboji, Per your request, I have sent the rev... 09/17/2010 08:46:03 AM

From: "Hipsky, Kerri (KA)" <KAHipsky@dow.com>
To: <Unugboji.Wilkinson@epamail.epa.gov>
Cc: "Fonseca, Diego (D)" <dfonseca@dow.com>, <mccann.geri@epamail.epa.gov>
Date: 09/17/2010 08:46 AM
Subject: RE: EPA Product Update for 62719-AGE (E-sub MRID 482083)

Unugboji,

Per your request, I have sent the revised studies to the attention of Geri McCann. The package was marked overnight and left our office yesterday, September 16, 2010. Thank you so much!

~Kerri

-----Original Message-----
From: Fonseca, Diego (D)
Sent: Thursday, September 16, 2010 1:36 PM
To: Hipsky, Kerri (KA)
Subject: FW: EPA Product Update for 62719-AGE (E-sub MRID 482083)
Importance: High

-----Original Message-----
From: Unugboji.Wilkinson@epamail.epa.gov
[mailto:Unugboji.Wilkinson@epamail.epa.gov]
Sent: Thursday, September 16, 2010 1:25 PM
To: Fonseca, Diego (D)
Cc: mccann.geri@epamail.epa.gov
Subject: EPA Product Update for 62719-AGE (E-sub MRID 482083)

Hi Mr. Fonseca,

Please consider this email as a follow up to our discussion concerning the deficiencies associated with your E-Submission data package (Reg, No. 62719-AGE; MRID 482083). Please find the deficiency list below:

Volume 2:

*Study is considered to be incomplete as a result of missing data on page 45.

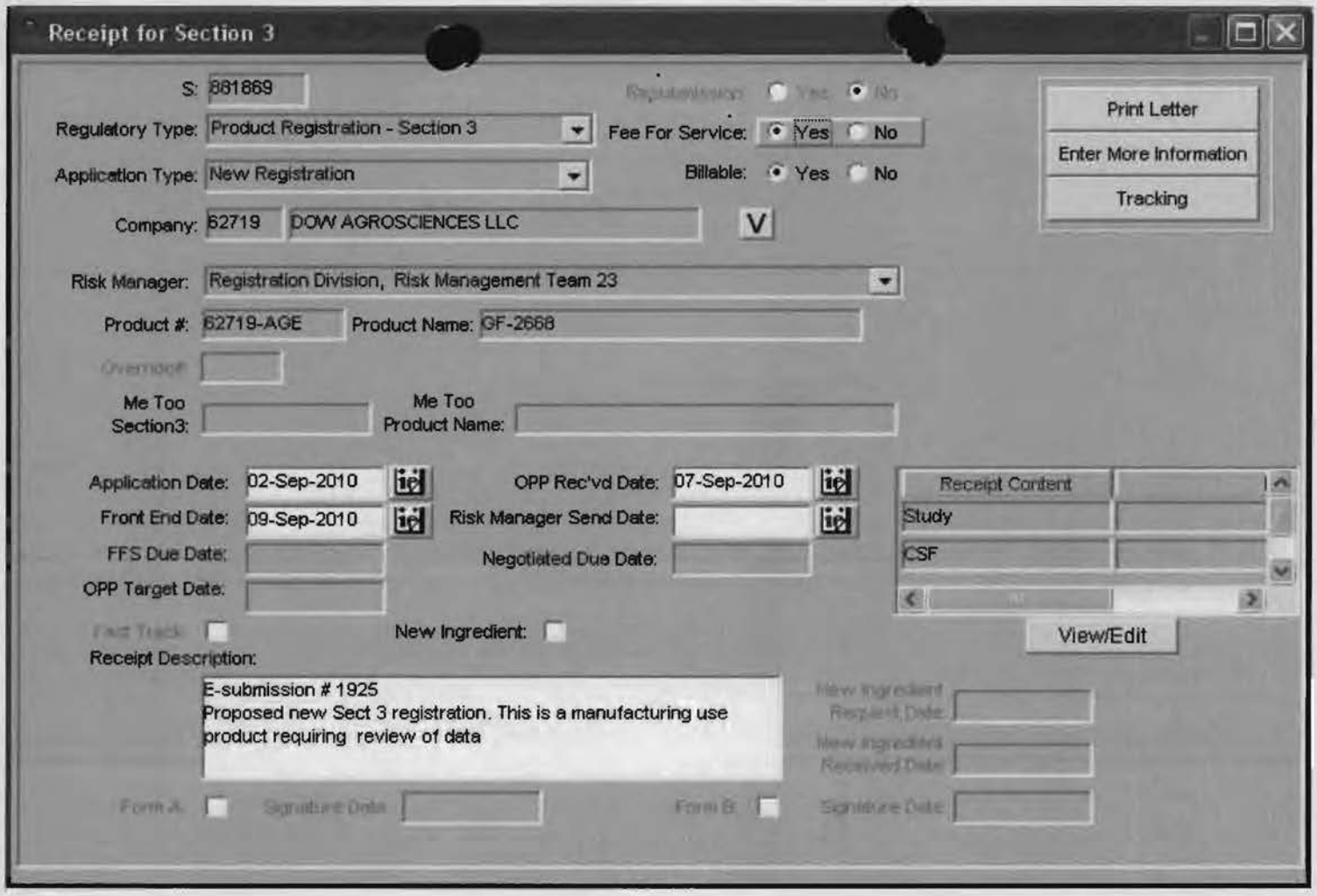
Volume 2-9:

*The assigned MRID numbers are not on the title pages of the studies.

Please make the necessary corrections and mail in the CD with the revised version of the studies. Once you have sent it, please inform me.

Regards,

Unugboji Wilkinson
Data Analyst - MacFadden/EPA Contractor
One Potomic Yard
2777 S.Crystal Drive, S-6921
Arlington, VA 22202
Tel:(703).347.8518
Fax:(703)305.5060
EPA mail: unugboji.wilkinson@epa.gov



E-SUBMISSION

FEE FOR SERVICE

R 310.

End Use (EP) or Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGAI). Must submit Group A and B product chemistry data for each proposed product unless it's a 100% identical (repack): YES or (NO) (circle one)

W = Waiver
N/A = Not applicable

Guideline No.	Group A: Product Chemistry Data Study Title	EP Data Submitted		MP Data Submitted		TGAI	
		Yes	No	Yes	No	Yes	No
830.1550	Product Identity & Composition			✓			
830.1600	Description of materials used to produce the product			✓			
830.1650	Description of formulation process				✓	N/A	
830.1670	Discussion on the formation of impurities			✓			
830.1700	Preliminary analysis			✓			
830.1750	Certified limits (158.345)			✓			
830.1800	Enforcement analytical method			✓			

Guideline No.	Group B: Product Chemistry Data Study Title	EP Data Submitted		MP Data Submitted		TGAI	
		Yes	No	Yes	No	Yes	No
830.6302	Color			✓			
830.6303	Physical State			✓			
830.6304	Odor			✓			
830.6313	Stability to normal and elevated temperatures metal and metal ions						
830.6314	Oxidation/Reduction (Chemical incompatibility)			✓			
830.6315	Flammability			✓		N/A	
830.6316	Explodability			✓			
830.6317	Storage stability				W		
830.6319	Miscibility				✓	N/A	
830.6320	Corrosion Characteristics				W		
830.6321	Dielectric Breakdown Voltage					N/A	
830.7000	pH			✓		N/A	
830.7050	UV/ Visible Absorption						
830.7100	Viscosity			✓		N/A	
830.7200	Melting Point						
830.7220	Boiling Point					N/A	
830.7300	Density			✓			
830.7370	Dissociation Constant						
830.7550	Partition Coefficient						
830.7840	Water Solubility						
830.7950	Vapor Pressure						

Grayed out = data not required

R 310

New products must either: 1) supply the product specific acute toxicity 6 pack data (listed below), or 2) provide a bridging rationale document. The bridging document directs OPP to use a currently registered set of 6 acute toxicity data and label; instead of submitting product specific data.

Guideline No.	Acute toxicity (6 pack) Study Title	Data submitted Yes	Data submitted No	Cited Yes	Cited No
870.1100	Acute Oral (LD50)	✓			
870.1200	Acute Dermal (LD50)	✓			
870.1300	Acute Inhalation (LC50)	✓			
870.2400	Acute Eye Irritation	✓			
870.2500	Acute Dermal Irritation	✓			
870.2600	Dermal Sensitization	✓			

Efficacy – which guideline is used depends on the proposed label use N/on Submitted

Guideline No.	Study Title	Data submitted Yes	Data submitted No	Cited Yes	Cited No	Comments
810.3100	Soil Treatments for Imported Fire Ants					
810.3200	Livestock, Poultry, Fur and Wool-Bearing Animal Treatments					
810.3300	Treatments to Control Pests of Humans and Pets					
810.3400	Mosquito, Black Fly, and Biting Midge (Sand Fly) Treatments					
810.3500	Premises Treatments					
810.3600	Structural Treatments					
810.3800	Methods for Efficacy Testing of Termite Baits					

9/22

PRIA 2 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

3/23/09

21 Day Screen Start Date: 9-7-10

Experts In-Processing Signature: MF Harrington Date 9-15-10 Fee Paid: Yes ✓

Division management contacted on issues No _____ Yes _____ Date _____

EPA Reg. Number: 62719-AGE	EPA Receipt Date: 9-7-10

	Items for Review			Yes	No	N/A*
1	**Application Form** (EPA Form 8570-1)(link to form) signed & complete including package type			X		
2	**Confidential Statement of Formula** all boxes completed, form signed, and dated (EPA Form 8570-4) (Link to form)			X		
	a) All inerts (link to http://www.epa.gov/opprd001/inerts/), including fragrances, approved for the proposed uses (see Footnote A)	**yes** X	**no**			
3	**Certification with Respect to Citation of Data** (EPA Form 8570-34) (Link to form) completed and signed (N/A if 100% repack)			X		
	Certificate and data matrix consistent			X		
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)	**yes**	**no**			
	If applicable, is there a letter of Authorization for exclusive use only.					
4	**Formulator's Exemption Statement** (EPA Form 8570-27) (Link to form) completed and signed (N/A if source is unregistered or applicant owns the technical)					X
5	**Data Matrix** (EPA Form 8570-35) (Link to form) both internal and external copies (PR 98-5) (Link to PR 98-5) completed and signed (N/A if 100% repack)			X		
	a) Selective Method (Fee category experts use)	**yes** X	**no**			
	b) Cite-All (Fee category experts use)					
	c) Applicant owns all data (Fee category experts use)					
6	**5 Copies of Label (link to http://www.epa.gov/oppfead1/labeling/lrm/) (Electronic labels on CD are encouraged and guidance is available)(link to** http://www.epa.gov/pesticides/regulating/registering/submissions/index.htm#labels **)**			X		

7	**Is the data package consistent with PR Notice 86-5** (link to PRN 86-5)	X	
8	**Notice of Filing (link to http://www.epa.gov/pesticides/regulating/tolerance_petitions.htm) included with petitions (link to http://www.epa.gov/pesticides/regulating/tolerances.htm)**		X
9	**If applicable for conventional applications, reduced risk rationale (link to http://www.epa.gov/opprd001/workplan/reducedrisk.html)**		X
10	**Required Data (link to http://www.epa.gov/pesticides/regulating/data_requirements.htm) and/or data waivers. See Footnote C.** a) List study (or studies) not included with application		

Comments:

* Applicant has sent the data package Corrections to Geri Mccann, but no Correction has been made to the data in documentum. All Mod 9/24/10 - OK

* Request for the pcc of active ingredient has been sent to Mr. Norman Spurlin. The active ingredient + its percentage Composition were not put in OPPIN as a result of the Pcc of active not ~~a~~being available within the allotted time for the processing of this Jacket. OK new 9/27

* CSF is approved for food use.

* Jacket is not approved.

MRID 482083

IK (6955)

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses. If an unapproved inert is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses **even if a product is currently registered** by consulting the inert Web

site [link to http://www.epa.gov/opprd001/inerts/lists.html] and if the inert is not approved, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient.** Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the Chief of Microbial Pesticides Branch [Link to http://www.epa.gov/oppbppd1/biopesticides/contacts_bppd.htm].

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information [link to http://www.epa.gov/opprd001/inerts/tips.pdf] must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R311, R312 or R313), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or

2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or

2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

NEW APPLICATIONS

DATE: 9/7/2010

FILE NUMBER: 62719-AGE

FEP (OPPIN ENTRY) E-sub# 1925-GM
(Initial & date)

FILE ROOM: _____
(Initial & date)

SIG: _____
(Initial & date)

FILE ROOM: _____
(Initial & date)

✓ **ASSIGN TO PM** 23 **(NO DATA)**

____ **JACKET TO SHELF (DATA)**

Esubmission
62719 - AGE

Memorandum

Need Admin Piece 10/29 ICM

Date: 10/22/10

To: RM 23, Regulatory Manager

From: Information Services Branch, ITRMD

Your receipt of this data submission is not an indication that MRIDs for the enclosed studies have been posted to OPPIN.

We expect that it will be approximately 5 days from the above date before the study-level data is available in OPPIN.

If you have any questions about this process, please contact Teresa Downs (305-5363).

This is a:
- ☒ fully accepted submission
- ☐ partially accepted submission
- ☐ rejected submission

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

October 22, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 308/2E
INDIANAPOLIS, IN 46268-1054

Report of Analysis for Compliance with PR Notice 86-5

Thank you for your submittal of 07-SEP-10. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 86-5. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

MRID No. 48208300

308/2E
September 2, 2010

Dow AgroSciences

Document Processing Desk **(APPL/E-SUB/REGFEE)**
Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

GF-2668 MANUFACTURING USE CONCENTRATE (AI: 2,4-D)
EPA REGISTRATION NUMBER: 62719-XXX
APPLICATION FOR NEW REGISTRATION - SECTION 3

Dow AgroSciences is respectfully submitting an application for new registration for GF-2668 Manufacturing Use Concentrate which is a concentrate required for the manufacturing of herbicides.

We believe this registration action qualifies as a ***PRIA action R310, $4,578.00, New end-use or manufacturing use product; requires review of data package within RD; includes reviews and/or waivers of data for only product chemistry, acute toxicity, public health pest efficacy.***. A complimentary copy of the Pay.Gov.Payment Confirmation has been included (Pay.gov Tracking ID: 251CVFMH; Agency Tracking ID: 74135355091

Dow AgroSciences is submitting this submission electronically (e-PRISM.xml New Section 3 for **GF-2668 Manufacturing Use Concentrate**).

Contents of Submission

Volume No.	**Administrative Contents**
Volume 1	▪ Transmittal document (this letter) ▪ Complimentary Copy: Pay Gov Payment Confirmation ▪ EPA Form 8570-1, Application for Pesticide, ▪ EPA Form 8570-34, Certification with Respect to Citation of Data ▪ EPA Form 8570-35, Data Matrix – Agency Copy (4 Pages) ▪ EPA Form 8570-35, Data Matrix – Public File Copy (4 Pages) ▪ Confidential Statement of Formula entitled GF-2668 Manufacturing Use Concentrate date August 19, 2010 (1 page) ▪ Label entitled 062719-XXXXX.20100806.GF-2668 MUP-XXX 06Aug10d.pdf (K1A / GF-2668 MUP / Prop Section 3 / 08-06-10) (4 Pages plus Registration Notes) ▪ CD containing e-PRISM.xml – New Section 3

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		Author: Boverhof Ph.D., D.R., Sosinski B.S., L. K. Study ID: 101043 Pages: 1-27	Report Date: June 16, 2010 (1 PDF Copy)

If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Cindy Loy, Regulatory Specialist at 317-337-4655 (caloy@dow.com).

Sincerely,

Diego Fonseca
Regulatory Leader – Regulatory Affairs
317-337-4693
317-337-4649 (FAX)
caloy@dow.com

Enclosures

DF/kh

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268-1054

MRID No. 48208300

308/2E
September 2, 2010

Dow AgroSciences

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Office of Pesticide Programs (7504P)
U. S. Environmental Protection Agency
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2777 S. Crystal Drive
Arlington, VA 22202

Attention: Kathryn Montague/PM-23 (7505P)

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If you require additional information, please contact Kerri Hipsky, Registration Assistant for this product, at 317-337-7827; (kahipsky@dow.com) or Cindy Loy, Regulatory Specialist at 317-337-4655 (caloy@dow.com).

Sincerely,

Diego Fonseca
Regulatory Leader – Regulatory Affairs
317-337-4693
317-337-4649 (FAX)
caloy@dow.com

Enclosures

DF/kh

Please read instructions on reverse before completing form. Form Approved. OMB No. 2070-0060 [Print Form]

United States Environmental Protection Agency Washington, DC 20460

[X] Registration [ ] Amendment [ ] Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number	2. EPA Product Manager	3. Proposed Classification
Dow AgroSciences/62719-XXX	Kathryn Montague	[ ] None [ ] Restricted
4. Company/Product (Name)	**PM#**	
Dow AgroSciences/GF-2668	23	

5. Name and Address of Applicant *(Include ZIP Code)*

[ ] *Check if this is a new address*

6. Expedited Review. In accordance with FIFRA Section 3(c)(3)(b)(i), my product is similar or identical in composition and labeling to:

EPA Reg. No. _____

Product Name _____

Section - II

[ ] Amendment - Explain below.
[ ] Resubmission in response to Agency letter dated _____
[ ] Notification - Explain below.
[ ] Final printed labels in response to Agency letter dated _____
[ ] "Me Too" Application.
[ ] Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

This action is for a proposed new Section 3 registration for GF-2668, the active ingredient is 2,4-D Choline Salt. This action is a manufacturing use product requiring review of data package. Therefore, this action is EPA PRIA No. R310, fee $4,578.00.

Section - III

1. Material This Product Will Be Packaged In:

Child-Resistant Packaging	Unit Packaging	Water Soluble Packaging	2. Type of Container
[ ] Yes* [X] No	[ ] Yes [X] No	[ ] Yes [X] No	[ ] Metal [X] Plastic [ ] Glass [ ] Paper [ ] Other (Specify) _____
* *Certification must be submitted*	If "Yes" Unit Packaging wgt. / No. per container	If "Yes" Package wgt / No. per container	

3. Location of Net Contents Information	4. Size(s) Retail Container	5. Location of Label Directions
[X] Label [ ] Container	55 gal	[X] On Label [ ] On Labeling accompanying product

6. Manner in Which Label is Affixed to Product [X] Lithograph / Paper glued / Stenciled [ ] Other _____

Section - IV

1. Contact Point *(Complete items directly below for identification of individual to be contacted, if necessary, to process this application.)*

Name	Title	Telephone No. (Include Area Code)
Diego Fonseca	Regulatory Leader	(317)337-4693

Certification

I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

6. Date Application Received (Stamped)

2. Signature	3. Title	5. Date
Diego Fonseca	Regulatory Leader	September 2, 2010

4. Typed Name: Diego Fonseca (dfonseca@dow.com)

E-SUBMISSION

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete. White - EPA File Copy (original) Yellow - Applicant Copy

Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268 1054

MRID No. 48208300

308/2E
September 2, 2010

Dow AgroSciences

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U. S. Environmental Protection Agency
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Sincerely,

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Regulatory Leader – Regulatory Affairs
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317-337-4649 (FAX)
caloy@dow.com

Enclosures

DF/kh

Form Approved OMB Nos. 2070-0060; 2070-0057; 2070-0107; 2070-0122; 2070-0164

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number Dow AgroSciences LLC, 9330 Zionsville Road, Indianapolis, IN 46268; 317-337-4693	EPA Registration Number/File Symbol 62719-XXX
Active Ingredient(s) and/or representative test compound(s) GF-2668	Date September 2, 2010
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) Terrestrial food crop use	Product Name GF-2668

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☑ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

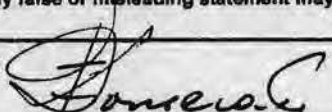
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature	Date	Typed or Printed Name and Title
	09/02/10	Diego Fonseca, Regulatory Leader

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.

E-SUBMISSION

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W.
WASHINGTON, D.C. 20460

DATA MATRIX

Date: September 2, 2010		EPA Reg No.:	**62719-XXX**
Registrant's Name & Address:	**Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268**	Product:	**GF-2668 Manufacturing Use Concentrate**
Ingredient: 2,4-D	Chemical: 030001		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	
830.1550	Product identity and composition	48208301	62719	OWN	**Submitted 09/02/10**
830.1600	Description of materials used to produce the product	48208301	62719	OWN	**Submitted 09/02/10**
830.1620	Description of production process	48208301	62719	OWN	**Submitted 09/02/10**
830.1670	Discussion of formation impurities	48208301	62719	OWN	**Submitted 09/02/10**
830.1750	Certified limits	48208301	62719	OWN	**Submitted 09/02/10**
830.1800	Enforcement analytical method	48208301	62719	OWN	**Submitted 09/02/10**
830.6302	Color	48208302	62719	OWN	**Submitted 09/02/10**
830.6303	Physical state	48208302	62719	OWN	**Submitted 09/02/10**
830.6304	Odor	48208302	62719	OWN	**Submitted 09/02/10**
830.6314	Oxidation/reduction: chemical incompatability	48208302	62719	OWN	**Submitted 09/02/10**
830.6315	Flammability	48208302	62719	OWN	**Submitted 09/02/10**
830.6316	Explodability	48208302	62719	OWN	**Submitted 09/02/10**
830.7000	pH	48208302	62719	OWN	**Submitted 09/02/10**
830.7100	Viscosity	48208302	62719	OWN	**Submitted 09/02/10**
830.7300	Density/relative density/bulk density	48208302	62719	OWN	**Submitted 09/02/10**
870.1100	Acute oral toxicity	48208303	62719	OWN	**Submitted 09/02/10**
870.1200	Acute dermal toxicity	48208304	62719	OWN	**Submitted 09/02/10**
870.1300	Acute inhalation toxicity	48208305	62719	OWN	**Submitted 09/02/10**
870.2400	Acute eye irritation	48208306	62719	OWN	**Submitted 09/02/10**
870.2500	Acute dermal irritation	48208307	62719	OWN	**Submitted 09/02/10**
870.2600	Skin sensitization	48208308	62719	OWN	**Submitted 09/02/10**

Signature:	Name and Title: Diego Fonseca, Global Regulatory Manager Dow AgroSciences LLC	Date: September 2, 2010

DATA MATRIX

Date: September 2, 2010		EPA Reg No.:	**62719-XXX**
Registrant's Name & Address:	**Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268**	Product:	**GF-2668 Manufacturing Use Concentrate**
Ingredient: 2,4-D	Chemical: 030001		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
	2,4-D Technical (62719-24, 62719-25) / Generic			
830.1550	Product Identity and composition	41055801	62719	OWN
830.1550	Product Identity and composition	41055802	62719	OWN
830.1550	Product Identity and composition	41055804	62719	OLD
830.1550	Product Identity and composition	41055805	62719	OLD
830.1600	Description of materials used to produce the product	41055801	62719	OWN
830.1600	Description of materials used to produce the product	41055804	62719	OLD
830.1620	Description of production process	41055801	62719	OWN
830.1650	Description of formulation process	N/A FOR TECH		
830.1670	Description of formation of impurities	41055801	62719	OWN
830.1670	Description of formation of impurities	41973501	62719	OLD
830.1700	Preliminary analysis	41055805	62719	OLD
830.1700	Preliminary analysis	43777502	62719	OWN
830.1750	Certified Limits	41055804	62719	OLD
830.1750	Certified Limits	43777502	62719	OWN
830.1800	Enforcement analytical method	41055802	62719	OWN
830.6302	Color	41055803	62719	OWN
830.6303	Physical state	41055803	62719	OWN
830.6304	Odor	41055803	62719	OWN
830.6313	Stability to sunlight, normal and elevated temperatures, metals, and metal ions	41055803	62719	OWN
830.6314	Oxidizing or reducing action	41973501	62719	OWN
830.6315	Flammability	N/A FOR TECH		
830.6316	Explodability	41973501	62719	OWN

DATA MATRIX

Date: September 2, 2010		EPA Reg No.:	**62719-XXX**
Registrant's Name & Address:	**Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268**	Product:	**GF-2668 Manufacturing Use Concentrate**
Ingredient: 2,4-D	Chemical: 030001		

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status
830.6317	Storage stability of product	WAIVED	62719	OWN
830.6319	Miscibility	N/A FOR TECH		
830.6320	Corrosion characteristics	WAIVED	62719	OWN
830.6321	Dielectric breakdown voltage	N/A FOR TECH		
830.7000	pH of water solutions or suspensions	N/A FOR TECH		
830.7050	UV/Visible absorption	44543504	62719	OWN
830.7100	Viscosity	N/A FOR TECH		
830.7200	Melting point/melting range	41055803	62719	OLD
830.7200	Melting point/melting range	41973501	62719	OWN
830.7220	Boiling point/boiling range	N/A FOR TECH		
830.7300	Density/relative density	41055803	62719	OWN
830.7300	Density/relative density	47290627	62719	OWN
830.7370	Dissociation constant in water	41055803	62719	OWN
830.7550	Partition coefficient (n-octanol/water), shake flask method	41055803	62719	OWN
830.7570	Partition coefficient (n-octanol/water), estimation by liquid chromatography	N/A FOR TECH		
830.7840	Water solubility: column elution method, shake flask method	41055803	62719	OWN
830.7860	Water solubility: generator column method	N/A FOR TECH		
830.7950	Vapor pressure	41055803	62719	OWN
870.1100	Acute oral toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN
870.1200	Acute dermal toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN

DATA MATRIX

Date: September 2, 2010		EPA Reg No.:	**62719-XXX**		
Registrant's Name & Address:	**Dow AgroSciences LLC 9330 Zionsville Road Indianapolis, IN 46268**	Product:	**GF-2668 Manufacturing Use Concentrate**		
Ingredient: 2,4-D	Chemical: 030001				
Guideline Reference Number	**Guideline Study Name**	**MRID Number**	**Submitter**	**Status**	
870.1300	Acute inhalation toxicity	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2400	Acute eye irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2500	Acute dermal irritation	See AcuteTox Profile (Attach 4)	Industry Task Force II on 2,4-D Research Data	OWN	
870.2600	Skin sensitization	47392101	62719	OWN	
CITE-ALL			Industry Task Force II on 2,4-D Research Data	OWN	
CITE-ALL			959857	PL	
CITE-ALL			Agricultural Re-Entry Task Force	OWN	
CITE-ALL			Endangered Species Task Force	OWN	
CITE-ALL			Outdoor Residential Exposure Task Force	OWN	
CITE-ALL			Spray Drift Task Force	PER	

(Label)

GF-2668 MUP

Herbicide

For Manufacturing Use Only

Active Ingredient:
2,4-dichlorophenoxyacetic acid,
choline salt 65.3%
Other Ingredients 34.7%
Total 100.0%

Acid Equivalent:
2,4-dichlorophenoxyacetic acid - 44.5% - 4.5 lb/gal

WARNING

Precautionary Statements

Hazards to Humans and Domestic Animals

Causes Substantial But Temporary Eye Injury • Causes Skin Irritation • Harmful If Swallowed

Do not get on skin, in eyes or on clothing.

First Aid

If in eyes: Hold eye open and rinse slowly and gently with water for 15-20 minutes. Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. Call a poison control center or doctor for treatment advice.
If on skin or clothing: Take off contaminated clothing. Rinse skin immediately with plenty of water for 15-20 minutes. Call a poison control center or doctor for treatment advice.
If swallowed: Call a poison control center or doctor immediately for treatment advice. Have person sip a glass of water if able to swallow. Do not induce vomiting unless told to do so by a poison control center or doctor. Do not give anything by mouth to an unconscious person.

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. You may also contact 1-800-992-5994 for emergency medical treatment information.

Environmental Hazards

This product is toxic to fish and aquatic invertebrates. Do not discharge effluent containing this product into lakes, streams, ponds, estuaries, oceans or other waters unless in accordance with the requirements of a National Pollutant Discharge Elimination System (NPDES) permit and the permitting authority has been notified in writing prior to discharge. Do not discharge effluent containing this product to sewer systems without previously notifying the local sewage treatment plant authority. For guidance, contact your State Water Board or Regional Office of the EPA.

Directions for Use

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

For Manufacturing Use Only

Only for formulation into an herbicide for the following uses: aquatic uses, banks of irrigation canals and ditches, barley, bayous, canals, corn (field, sweet, and popcorn), crop stubble, drainage ditches, established grass pastures, fallow land, forestry, lakes, marshes, millet, non-cropland areas, oats, ornamental turfgrass, pistachio orchard floors, pome fruit orchard floors, ponds, rangeland, reservoirs, rice, rivers and streams, rye, sod farms, sorghum-grain sorghum (milo) and forage, soybeans, stone fruit orchard floors, sugarcane, tree nut (excluding filberts) orchard floors, turfgrass grown for seed, and wheat.

Wettable powder formulations must be packaged in water-soluble packages.

This product may be used to formulate products for specific use(s) not listed on the MP label if the formulator, user group, or grower has complied with U.S. EPA submission requirements regarding support of such use(s).

(Storage and Disposal for rigid containers 5 gal or less)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.
Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.
Container Handling: Nonrefillable container. Do not reuse or refill this container.
Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for refillable rigid containers larger than 5 gal)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.
Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.
Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.
Container Handling: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.
Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller. To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10% full with water and, if possible, spray all sides while adding water. If practical,

agitate vigorously or recirculate water with the pump for two minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

(Storage and Disposal for nonrefillable rigid containers larger than 5 gal)

Storage and Disposal

Do not contaminate water, food or feed by storage or disposal.

Pesticide Storage: Store in original container only in a cool, dry place. Keep container tightly closed when not in use. Do not store below temperature of 45°F (7°C). If frozen (crystallized), warm to 80 to 90°F (27 to 32°C) and re-dissolve before using by rolling or shaking the container. Reduce stacking height where local conditions can affect packaging strength.

Pesticide Disposal: Pesticide wastes are toxic. Improper disposal of excess pesticide, spray mixture, or rinsate is a violation of Federal law and may contaminate groundwater. If these wastes cannot be disposed of by use according to label instructions, contact your State Pesticide or Environmental Control Agency, or the Hazardous Waste Representative at the nearest EPA Regional Office for guidance.

Container Handling: Nonrefillable container. Do not reuse or refill this container.

Triple rinse or pressure rinse container (or equivalent) promptly after emptying. **Triple rinse** as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times. **Pressure rinse** as follows: Empty the remaining contents into application equipment or a mix tank and continue to drain for 10 seconds after the flow begins to drip. Hold container upside down over application equipment or mix tank or collect rinsate for later use or disposal. Insert pressure rinsing nozzle in the side of the container, and rinse at about 40 psi for at least 30 seconds. Drain for 10 seconds after the flow begins to drip. Then offer for recycling if available, or puncture and dispose of in a sanitary landfill, or by incineration, or by other procedures allowed by state and local authorities.

Warranty Limitations and Disclaimer

Dow AgroSciences warrants that at the time of delivery, the product will conform to its chemical description on the label, that it will pass without objection in the trade under the contract description, that seller will convey good title thereto, and that such product will be delivered free from any lawful security interest, lien or encumbrance.

To the extent permitted by law, this is the only warranty made on this product. TO THE EXTENT PERMITTED BY LAW, Dow AgroSciences EXPRESSLY DISCLAIMS ANY IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE AND, EXCEPT AS SET FORTH IN THE ABOVE PARAGRAPH, ANY OTHER EXPRESS OR IMPLIED WARRANTIES. To the extent permitted by law, buyer acknowledges the use of its own independent skill and expertise in the selection and use of the product and does not rely on any oral or written statements or representations.

In case of emergency endangering health or the environment involving this product, call 1-800-992-5994.

Manufacturing Chemical: Do not ship or store with food, feeds, drugs or clothing.

EPA Reg. No. 62719-XXX EPA Est. _____

Produced for
Dow AgroSciences LLC
9330 Zionsville Road
Indianapolis, IN 46268

Net Contents _____

EPA accepted __/__/__

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

September 13, 2010

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

OPP Decision Number: D-439584
EPA File Symbol or Registration Number: 62719-AGE
Product Name: GF-2668
EPA Receipt Date: 07-Sep-2010
EPA Company Number: 62719
Company Name: DOW AGROSCIENCES LLC

JOHN R. FITT, JR.
DOW AGROSCIENCES LLC
9330 ZIONSVILLE RD 308/2E
INDIANAPOLIS, IN 46268-1054

SUBJECT: Receipt of Registration Application Subject to Registration Service Fee

Dear Registrant:

The Office of Pesticide Programs has received your application and certification of payment. If you submitted data with this application, the results of the PRN-86-5 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: R310

NEW PRODUCT;NON-FAST TRACK (INCLUDES REVIEWS OF PRODUCT CHEMISTRY;ACUTE TOXICITY;PUBLIC HEALTH PEST EFFICACY);

No additional payment is due at this time.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 308-9362.

Sincerely, Teresa Dorrse
Front End Processing Staff
Information Technology & Resources Management Division

Fee for Service

{881869c~

This package includes the following

- ◉ New Registration
- ○ Amendment

☑ Studies? ☐ Fee Waiver?

☐ volpay % Reduction: ___

for Division

- ○ AD
- ○ BPPD
- ◉ RD

Risk Mgr. 23

Receipt No. S- 881869

EPA File Symbol/Reg. No. 62719-AGE

Pin-Punch Date: 9/7/2010

☐ This item is NOT subject to FFS action.

Action Code:

Requested: R310

Granted: R310

Amount Due: $ 4578 ~~00~~

Parent/Child Decisions:

▣ Inert Cleared for Intended Use ▣ Uncleared Inert in Product

Reviewer: _____ Date: 9/10/10

Remarks:

E-SUBMISSION

Hipsky, Kerri (KA)

From: Wiley, Tracey (TR)
Sent: Monday, August 30, 2010 2:06 PM
To: Hipsky, Kerri (KA)
Cc: FAGUSRG
Subject: FW: Pay.Gov Payment Confirmation

K1A

-----Original Message-----
From: paygovadmin@mail.doc.twai.gov [mailto:paygovadmin@mail.doc.twai.gov]
Sent: Monday, August 30, 2010 2:03 PM
To: Wiley, Tracey (TR)
Subject: Pay.Gov Payment Confirmation

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Your transaction has been successfully completed.

Transaction Summary

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 251CVFMH
Agency Tracking ID: 74135355091

Account Holder Name: Tracey Wiley
Transaction Type: Sale
Transaction Amount: $4,578.00
Billing Address: State Regulatory
Billing Address 2: 9330 Zionsville Road
City: Indianapolis
State/Province: IN
Zip/Postal Code: 462681054
Country: USA
Card Type: Visa
Card Number: **********4335
Transaction Date: Aug 30, 2010 2:03:16 PM

Decision Number:
Registration Number: GF-2668 MFG Use
Company Name: Dow AgroSciences LLC
Company Number: 62719
Action Code: R310

Pages 99-106 - *Confidential Statements of Formula may be entitled to confidential treatment*